

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

TIFFANI N. NEUBEL-JOHNSON,

Plaintiff,

v.

COLLIN COLLEGE,

Defendant.

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Civil Action No. 4:22-cv-1029-SDJ-BD

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Respectfully submitted,

/s/ Kimberly S. Moore

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this, the 7th day of July, 2025, a true and correct copy of this document was filed utilizing the Court's ECF system.

/s/ Kimberly S. Moore
KIMBERLY S. MOORE

EXHIBIT A



Tiffani Neubel-Johnson
2615 Summerview Lane
Lancaster, TX 75146

Re: Offer of Employment at Collin College

Dear Tiffani,

Collin College is pleased to offer you the position of full-time Professor, Pharmacy Technician.

- Annual salary: \$ 83,546.00, paid on a monthly basis. Refer to the faculty pay schedule for more information.
- Benefit information is available at Collin.edu/hr/benefits.
- Hiring manager: Hatem Aboalam
- Campus location: 2550 Bending Branch Way, Collin College Technical Campus, Allen, TX 75013 USA
- Start date: March 22, 2021

Remaining new-hire action items:

- You will receive an email with details regarding new-hire onboarding documentation to complete at least one week prior to your start date.
- You will also receive correspondence to register for an in-person HR benefits meeting at the Collin Higher Education Center, located at the corner of US 75 and State Hwy. 121, just north of the McKinney Regional Medical Center.
- During your benefits meeting, the employer sections of the Form I-9 will be completed. Bring appropriate documentation to complete your I-9.
- If your position requires a degree, you must submit official transcripts to HR within your first 30 days of employment.
- The first 90 days are a probationary period. If you anticipate the need for time off within your first 90 days, please submit your request with this offer.

If you have any questions, please feel free to contact the HR department at 972-985-3783.

Sincerely,

Christy Phoenix
HR Consultant

Collin College is an at-will employer.

EXHIBIT B

Tiffani Neubel-Johnson * June 9, 2025

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TIFFANI N. NEUBEL-JOHNSON,	*	
Plaintiff,	*	
	*	
VS.	*	Civil Action No.
	*	4:22-cv-1029-SDJ-BD
COLLIN COLLEGE,	*	
Defendant.	*	

ORAL AND VIDEOTAPED DEPOSITION OF
TIFFANI N. NEUBEL-JOHNSON
JUNE 9, 2025

DEPOSITION of TIFFANI N.

NEUBEL-JOHNSON, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on the 9th day of June, 2025, from 9:30 a.m. to 6:15 p.m., before Christy R. Sievert, CSR, RPR, in and for the State of Texas, reported by machine shorthand, at the offices of Clark Hill, 2600 Dallas Parkway, Suite 600, Frisco, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Tiffani Neubel-Johnson * June 9, 2025

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1 A P P E A R A N C E S

2

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14

ALSO PRESENT:

15

BARNES VIDEO GROUP, Videographer
16 MONICA VELAZQUEZ, Collin College

17

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1 A. Yes, ma'am.

2 Q. Did you apply for SSDI before you left
3 Collin College?

4 A. Yes, ma'am.

5 Q. Other than this application, Exhibit 2 --
6 well, this isn't your application, but other than
7 your January 2022 application for SSDI benefits, had
8 you ever applied for SSDI benefits before?

9 A. Yes.

10 Q. When was that?

11 A. In 2017.

12 Q. Was that while you were at UT Southwestern
13 or after?

14 A. When I left, after.

15 Q. How long did you receive SSDI benefits
16 after you applied in 2017?

17 A. I didn't.

18 Q. Was that application denied?

19 A. No, I didn't pursue it anymore after I
20 found employment.

21 Q. Other than this 2022 application and the
22 2017 application for SSDI, have there -- have there
23 been any other instances when you applied for SSDI
24 benefits?

25 A. No, ma'am.

1 A. When I started working at the church.

2 Q. And you said you started working at the
3 church in around July of 2022?

4 A. Officially it was August. He approached me
5 in July, but it was officially in August of '22.

6 Q. And why -- why did you stop looking for
7 work in your -- in the pharmacy tech field?

8 A. Because I was working at my church where I
9 knew they would work with me and my disabilities.

10 Q. And why have you not tried to -- or have
11 you tried to look for any work back in the pharmacy
12 field since you have started working for the church?

13 A. I'm sorry, repeat the question.

14 Q. Sure.

15 Since you started working for the church
16 in August of 2022, have you tried to look for work
17 back in the pharmacy tech world at all?

18 A. No, ma'am.

19 Q. And why is that?

20 A. Because of my healthcare has -- coverage
21 and medication, having access to it has been
22 inconsistent, so having that consistency and trying
23 to recover and get better, it's -- it's been a long
24 process. So going back into that, it would be hard
25 to maintain the -- or just performing job

1 responsibilities without the consistency of
2 medication and other accommodations.

3 Q. And when you say that your health -- the
4 healthcare -- having the consistency in the
5 healthcare, is that a reference to the Medicare that
6 you're receiving?

7 A. No.

8 Q. What's the -- what's the consistency that
9 you're. . .

10 A. So it's medication management, behavioral
11 health therapy.

12 Q. And why would you not be able to receive
13 that if you were working in the pharmacy tech field?

14 A. Because I have to be stable in order to go
15 into it with good work performance.

16 Q. So I don't want to put words in your mouth.
17 Is it that -- I'm just trying to understand.

18 Is it that you don't feel that you're
19 stable enough to go back into the pharmacy tech
20 field at this point?

21 A. No.

22 Q. No, that's not it or no, you don't feel
23 stable enough?

24 A. I don't feel stable enough.

25 Q. Do you have any plans in the near future to

1 A. The same that was there for the -- the
2 interview panel.

3 Q. The panel?

4 A. Yes.

5 Q. And did you interview on campus?

6 A. The panel interview was via Zoom. The
7 first one was Zoom. The second one was on campus.
8 And the third one was on campus, but via video with
9 Dean Millen.

10 Q. So you allege in your Amended Complaint
11 that you disclosed your disability during your job
12 interview, correct?

13 A. Yes, ma'am.

14 Q. And that was with your -- that was during
15 your final interview with Dean Millen?

16 A. No, that was an initial -- the first
17 interview panel. Also during the second interview,
18 the teaching demonstration as well.

19 Q. Okay. Tell me how it came up during the
20 panel interview.

21 A. I believe there was a question asked about
22 what is your weakness -- what do you think your
23 weakness is or something or strengths, and my answer
24 was my -- my ADHD.

25 And I described the weakness of the

1 distractions and things like that; however, it
2 allows me to think outside the box. It allows me to
3 do other things with creativity. And the skills
4 that I learned from being able to manage the ADHD
5 through different trainings, workshops, and
6 behaviorial health allow me to manage it properly.
7 So with that, I learned different skills on how to
8 learn and retain information. So that was part of
9 my explanation of my weakness and strengths at the
10 same time.

11 Q. Okay. So you disclosed your ADHD to the
12 panel. Did anyone give a response to that?

13 A. I think they were, like, oh, that's --
14 that's cool, that's nice or something.

15 Q. Okay. And then how did your -- did any
16 other disability come up during the panel interview?

17 A. No. No, ma'am.

18 Q. And then during the sample teaching
19 interview, how did your ADHD come up then?

20 A. The document that I used as a teaching -- a
21 part of the teaching sample, I passed out a
22 document, a pencil with, like, a piece of paper
23 attached it to. And using all the skills that I had
24 learned , I explained the document and how I used
25 that information to retain information, how I would

1 teach that to -- to the students, and I showed them
2 how to utilize it and -- and how it worked.

3 And a few of the panelists asked me could
4 they actually have it and use it for their students.

5 Q. And how was -- how was that document or
6 that conversation related to your ADHD?

7 A. Because I created that document based on
8 off of the skills I learned with my life coach to be
9 able to learn how to learn and retain information.
10 So I created that document for myself and realized
11 it worked, so I started using it to teach my
12 students with.

13 Q. I see.

14 Did any other disability come up during
15 your sample teaching interview?

16 A. No, ma'am.

17 Q. Okay. And then your interview with Dean
18 Millen, how did your ADHD come up in that interview?

19 A. I don't believe it came up in that
20 interview.

21 Q. Okay. Did any of your disabilities come up
22 in your interview with Dean Millen?

23 A. No, ma'am.

24 Q. Okay. And you don't claim in your Amended
25 Complaint that you asked for any reasonable

1 accommodation as part of your hiring process,
2 correct?

3 A. No, ma'am.

4 Q. Okay. And how did you learn that you had
5 been selected for the professor 260 job?

6 A. I received an e-mail and a phone call.

7 Q. And approximately when did you start
8 working at Collin College?

9 A. March 21st or 22nd.

10 Q. Sometime in March of 2021?

11 A. Yes, ma'am.

12 Q. And you're going to have to help me with
13 Hatem's last name. How do you say it? We'll just
14 call him --

15 A. Aboalam.

16 Q. Okay. How about if we -- can we agree to
17 call him Hatem?

18 A. Yes.

19 Q. Okay. Was Hatem your supervisor when you
20 started work at Collin College?

21 A. Yes, ma'am.

22 Q. Was he your only supervisor?

23 A. Yes, ma'am.

24 Q. And were you supervised by anybody else
25 during your time with Collin College?

1 to work?

2 A. No, ma'am.

3 Q. Was she there when the fall semester began?

4 A. Yes.

5 Q. Was she still there when you resigned?

6 A. Yes, ma'am.

7 Q. And Hatem was also Dr. Bands' supervisor?

8 A. Yes, ma'am.

9 Q. Okay. Other than you and Dr. Bands, did
10 Hatem supervise anyone else while you were with
11 Collin College?

12 A. No, ma'am.

13 Q. Okay. So you allege in your Amended
14 Complaint that you arrived at Collin College with
15 your service dog, correct?

16 A. Yes, ma'am.

17 Q. And how many dogs did you bring to work
18 with you on your first day?

19 A. One.

20 Q. What kind of dog was it?

21 A. A Yorkie.

22 Q. Had you notified anyone at Collin College
23 of your need for a service dog before you started?

24 A. No, ma'am.

25 Q. And you testified earlier that you had

1 Q. So in this first e-mail to Hatem on
2 April 29th, all you ask Hatem about is whether you
3 can have weekly meetings, correct?

4 A. Yes.

5 Q. You don't mention a need for focus time in
6 this e-mail, do you?

7 A. No. No.

8 Q. And Hatem responds to you by saying -- for
9 your request to have weekly meetings, he says, "I
10 will think about how that could be done and we can
11 discuss in details on the upcoming meeting." Right?

12 A. Yes.

13 Q. So turning back to Exhibit 14, your
14 communications with Ms. Phoenix, you sent another
15 e-mail to Ms. Phoenix on Monday, April 3rd -- or,
16 sorry, Monday, May 3rd, which is at COLLIN119,
17 correct?

18 A. Yes.

19 Q. And what -- why did you send that e-mail to
20 Ms. Phoenix?

21 A. To follow up on -- to let her know that I
22 was moving forward with the suggestions that she had
23 given me with my concerns and how I did that.

24 Q. And, again, you don't mention anything
25 about focus time in this e-mail, do you?

1 logged, you would need to provide the appropriate
2 medical information, correct?

3 A. Yes.

4 Q. And you responded on May 13th, "Okay, thank
5 you." Correct? "Good evening. Okay, thank you"?

6 A. Yes.

7 Q. And the doctor's note that we looked at
8 earlier that you submitted in connection with your
9 request for a service dog did not mention the need
10 for additional time to complete projects, right?

11 A. No.

12 Q. Or daily focus time?

13 A. No, ma'am.

14 Q. Or flexibility in your work schedule?

15 A. No, ma'am.

16 Q. And you didn't subsequently tell
17 Ms. Canales that you -- or you didn't ask her for
18 time off to see your doctor to get that additional
19 information that you would need to submit your
20 request for accommodation, did you?

21 A. I didn't because she already had it. She
22 said she needed the information to substantiate the
23 need for the -- to identify the impairment for the
24 requested accommodation. In the initial letter,
25 it -- it stated the information that would

1 medication. Not allowing you to -- the time to
2 attend the necessary doctor's appointments created a
3 barrier to your accommodation requests.

4 Is that accurate?

5 A. Yes, ma'am.

6 Q. Did you ever notify Ms. Canales that you
7 needed time off to go to the doctor specifically to
8 get the note she said you needed to submit the
9 accommodation request?

10 A. I don't know. I don't remember.

11 Q. Did you speak with your doctor's office to
12 see if they would send a note without an office
13 visit?

14 A. I did.

15 Q. And what did they say?

16 A. I was required to come in.

17 Q. You were required to come in?

18 A. For FMLA disability papers, anything that's
19 -- relative to something like that needed to be seen
20 in the office.

21 Q. And which office was that?

22 A. Dr. Boghara's office.

23 Q. And so in that Bullet 2 where you say, "Not
24 allowing Neubel-Johnson the time to attend the
25 necessary Doctor's appointments created a barrier to

1 Neubel-Johnson's accommodation request," when did
2 Ms. Canales deny you time to attend necessary
3 doctor's appointments?

4 A. She didn't deny me time. She just
5 requested a letter of information that she had
6 already.

7 Q. And when did Hatem deny you time to attend
8 the necessary doctor's appointments to obtain
9 your -- the note that you needed to submit your
10 accommodation request?

11 A. By telling me my office hours were expected
12 to be 8:00 to 5:00. Plus, in the Level 1 write-up,
13 he mentioned me not being in my office as an issue.
14 So not being in my office at work, it was --
15 revolved around time and being available.

16 MS. KUELBS: Which one was that? 21?

17 THE STENOGRAPHER: Yes.

18 MS. KUELBS: Thank you.

19 (Exhibit No. 21 marked.)

20 BY MS. KUELBS:

21 Q. Okay. I've just been -- I just handed you
22 -- or the court reporter just handed you what's been
23 marked as Exhibit 21.

24 And is this a series of e-mails that you
25 exchanged with, it looks like, Hatem and then

1 leave the country for an urgent matter and moving
2 his patients' appointments up. My appointments have
3 been changed to tomorrow at 12:30 pm and Friday,
4 Sept. 17th all day. I teach via Zoom tomorrow until
5 noon and work the rest of the day from home or take
6 off the rest. Friday, I will put in a time
7 request."

8 Did I read that correctly?

9 A. Yes, ma'am.

10 Q. And then Hatem responds by asking whether
11 you were converting all classes the next day into
12 Zoom, correct?

13 A. Yes.

14 Q. And then you respond by saying, "Yes," and
15 then clarifying your schedule for the 15th, correct?

16 A. Yes.

17 Q. And Hatem responds, "That is alright with
18 me. Did you already notify the students for both
19 sections of the change?" Correct?

20 A. Yes.

21 Q. So Hatem did not stop you from going to the
22 doctor on September 15th or September 17th, did he?

23 A. No, ma'am.

24 (Exhibit No. 27 marked.)

25 BY MS. KUELBS:

1 A. Yes. But they also agreed to order me a
2 window shade, so I didn't see what the difference
3 was to order a window shade to be able to close it
4 during lunch break versus me having to coverings up
5 and taking them down.

6 Q. Well, isn't it also true that during that
7 meeting, in the recorded conversation of that
8 meeting that you attached to your Amended Complaint,
9 that Dean Millen and Ms. Phoenix suggested that an
10 alternative accommodation to the paper on your
11 window would be to move to a different office?

12 A. Yes.

13 Q. Did you ever ask to move offices?

14 A. No.

15 Q. Why not?

16 A. Because there was an ongoing conversation
17 about the location of my office and how it was
18 affecting my work, and there were two empty offices
19 in the same location on the next hallway. I don't
20 know how that works to move offices, but if it was
21 an issue -- an ongoing issue with me requesting a
22 window covering and closing my door and location, I
23 didn't know if that was something I had to request
24 or it was something that they would be willing to
25 just move my office.

1 Q. So you never -- you never sent something to
2 Ms. Canales saying, I would like to move offices as
3 an accommodation of my disability?

4 A. No, ma'am.

5 Q. Turning back to your amended interrogatory
6 responses, again, Interrogatory No. 6, which asked
7 for details about your assertion that the college
8 obstructed your request for reasonable
9 accommodations.

10 A. Which -- which exhibit?

11 Q. It was Exhibit No. 4.

12 A. Which page?

13 Q. The question starts on No. 2 -- page No. 2,
14 but then the answer I'm going to point you to is on
15 No. 3.

16 So in connection with your claim that
17 there was an obstruction to your request for
18 reasonable accommodations, No. 3, you discuss your
19 claim that you -- that on June 3rd, you talked with
20 Hatem about the need to cover your office window.
21 And then you say, "During a meeting on June 14,
22 2021, with Hatem, Dean Millen, and Christy,
23 Neubel-Johnson reiterated her need for window
24 coverings, Neubel-Johnson was informed that they
25 were considering ordering a shade, but in the

1 Point No. 3, you don't mention the fact that Dean
2 Millen, during that June 14th, 2021, meeting brought
3 up the possibility of you switching offices as an
4 alternative accommodation, do you?

5 A. No, I didn't.

6 (Exhibit No. 30 marked.)

7 BY MS. KUELBS:

8 Q. Okay. I'm showing you what's been marked
9 as Exhibit 30. Do these appear to be e-mails that
10 you exchanged with Hatem on June 8th and June 9th,
11 2021?

12 A. Yes.

13 Q. Okay. Turning to the last page of this
14 exhibit, is that an e-mail -- what is the pharmacy
15 tech program at Collin College e-mail address that
16 you originally sent an e-mail to on June 8th?

17 A. You said what is it?

18 Q. Uh-huh. What is -- what is that e-mail
19 address, PharmacyTechProgram
20 @CollinCollege620.onmicrosoft.com?

21 A. You're asking what is it?

22 Q. Yes.

23 A. I don't understand.

24 Q. So normally you would see -- so it's from
25 Tiffani Johnson, and I'm used to seeing, like, to

1 Hatem or to Christy Phoenix.

2 Who is this e-mail to? Because I just
3 don't know who receives the pharmacy -- who were you
4 e-mailing when you e-mailed PharmacyTechProgram?

5 A. That was an e-mail address that I created
6 to use in the pharmacy handbook so when someone
7 reached out asking questions, the questions would
8 come -- go to Hatem and myself as an informational
9 type e-mail. So if he or myself responded, it will
10 come to both of us and we will get those inquiries
11 about the program.

12 Q. I see.

13 So when you sent this e-mail on June 8th
14 asking, "Can we remove the due date for this task
15 seeing that we been spending a lot of time on the
16 Packet," who were you directing that question to?

17 A. Hatem.

18 Q. And Hatem responds on June 9th, "The packet
19 is only a small part of the handbook, you can
20 deliver the rest of it. The due date remains the
21 same for today." Correct?

22 A. Yes.

23 Q. So he denied your request to remove the due
24 date for the task; is that accurate?

25 A. Yes.

1 the page to submit and initiate your complaint,
2 grievance or appeal."

3 Do you see that?

4 A. It's on page 8?

5 Q. Using the numbers that are sort of across
6 the top, where it says page 8 of 15.

7 A. Yes.

8 Q. And so you see where it says that in order
9 to finalize the complaint, you have to hit the
10 "Submit" button at the bottom of the page?

11 A. Yes.

12 Q. Do you have any e-mail acknowledging
13 receipt of your complaint on June 10th?

14 A. No, ma'am.

15 Q. How do you know that you did, in fact,
16 submit this complaint on June 10th, 2021?

17 A. What do you mean how do I know?

18 Q. So sometimes when you submit a form online,
19 you'll get a receipt or confirmation that it was
20 received.

21 Do you have any evidence that you
22 submitted this other than your memory that you hit
23 "Submit" and sent it in?

24 A. No, ma'am.

25 Q. So going back to the June 14th meeting that

1 correct?

2 A. Yes, ma'am.

3 Q. And you responded by notifying Ms. Jacobson
4 that you did file a formal complaint on June 10th,
5 but never received a response from the hearing
6 officer, correct?

7 A. Yes, ma'am.

8 Q. And Ms. Jacobson indicated to you that
9 Collin College had never received a formal complaint
10 through the Collin College complaint system,
11 correct?

12 A. Yes.

13 Q. And then did you end up resubmitting a
14 complaint to Collin College on July 13th?

15 A. Yes, ma'am.

16 (Exhibit No. 37 marked.)

17 BY MS. KUELBS:

18 Q. Okay. You have just been handed what was
19 marked Exhibit 37. Do you recognize that document?

20 A. Yes, ma'am.

21 Q. Is that a copy of the complaint that you
22 submitted through the Collin College complaint
23 portal on July 13th, 2021?

24 A. I didn't submit it through the portal.

25 Q. How did it get filed on July 13th?

1 A. Tonya submitted it. I sent her a copy of
2 the complaint and the attachments that was uploaded,
3 and she filled in everything and submitted it.

4 Q. Did you verify that the details in what she
5 filled out for you was accurate at that time?

6 A. Yes, ma'am.

7 Q. And looking back at Exhibit 36, on
8 July 13th, Ms. Jacobson acknowledged receiving the
9 complaint and stated that they would begin the
10 grievance process, correct?

11 A. Yes, ma'am.

12 Q. And that she would be in touch with you
13 regarding scheduling your complaint hearing with the
14 Resolution Review Panel?

15 A. Yes, ma'am.

16 Q. Now, in Exhibit 37, the complaint that
17 was -- you say Ms. Jacobson filled out for you,
18 those are the same allegations that you made in the
19 June 10th form that we looked at earlier, correct?

20 A. Yes, ma'am.

21 Q. You didn't add any new allegations?

22 A. No, ma'am.

23 Q. And you didn't claim anything new had
24 happened between when you drafted the complaint on
25 June 10th and when you -- when it was submitted on

1 Findings/Resolution of Complaint," have you seen
2 that document before?

3 A. Yes, ma'am.

4 Q. Was that attached to Ms. Jacobson's
5 September 9th e-mail?

6 A. Yes, ma'am.

7 Q. And is that the Resolution Review Panel's
8 findings in connection with the internal complaint
9 that was submitted on July 13th, 2021?

10 A. That was submitted on July -- on June 10th?

11 Q. I understand that's when you believe it was
12 submitted initially, but then it was resubmitted on
13 July 13th, correct?

14 A. Correct.

15 Q. Did the Review Panel substantiate any of
16 the claims that you had made?

17 A. They didn't.

18 Q. And in the e-mail that Ms. Jacobson sent to
19 you on September 9th, she said you could appeal the
20 review board's findings within 10 days, correct?

21 A. Correct.

22 Q. And there was an Appeal Form attached to
23 the e-mail?

24 A. Yes.

25 Q. Turning to the page marked COLLIN351 and

1 352, are those the Appeal Form Instructions and
2 Appeal Form?

3 A. Yes, ma'am.

4 Q. You never appealed the Review Panel's
5 findings, did you?

6 A. I did not.

7 Q. And you continued to work with Hatem?

8 A. I did.

9 Q. And you attended weekly meetings with him?

10 A. Yes.

11 Q. But you didn't file any additional
12 complaints against Hatem before you filed your EEOC
13 charge, correct?

14 A. Correct.

15 Q. And as we discussed earlier, Hatem
16 continued to grant you leave when you requested it,
17 correct?

18 A. Yes.

19 (Exhibit No. 42 marked.)

20 BY MS. KUELBS:

21 Q. All right. I am showing you what's been
22 marked as Exhibit 42. Do you recognize this
23 document?

24 A. Yes, ma'am.

25 Q. What is it?

1 is what would make that time go past much longer.

2 Q. Okay. And those episodes would ultimately
3 potentially make you late to start teaching?

4 A. Yes.

5 Q. And so you needed -- or you were seeking
6 some additional time and/or the ability to teach
7 remotely?

8 A. Yes.

9 Q. So you allege in your Amended Complaint on
10 page 13 of 17, under September 29th, 2021, you say,
11 "I submitted another formal accommodation request
12 that included a modified schedule, additional time
13 to complete tasks and projects, professional
14 training for supervisors that work with employees
15 with ADHD, covering for my office door, and
16 scheduling uninterrupted time to work without
17 distractions."

18 Turning to Exhibit 42, you don't request
19 anywhere in this submission to HR additional time to
20 complete tasks and projects, do you?

21 A. No, ma'am.

22 Q. And nowhere in the submission at Exhibit 42
23 do you request covering for your office door, do
24 you?

25 A. No.

1 Q. And nowhere in the submission of Exhibit 42
2 do you request uninterrupted time to work without
3 distractions, do you?

4 A. No, ma'am.

5 Q. And at the very bottom of the document, on
6 page 2 of the document under Section D,
7 "Acknowledgments," in response to the question, "I
8 understand that I am responsible for providing
9 documentation of my disability that supports this
10 request for accommodations," you wrote, "Yes,"
11 correct?

12 A. Yes, ma'am.

13 Q. And under, "I understand that I must
14 provide documentation from an appropriate health
15 care professional to establish my eligibility as a
16 person with a disability," you also answered "Yes,"
17 correct?

18 A. Yes.

19 (Exhibit No. 43 marked.)

20 BY MS. KUELBS:

21 Q. Okay. You have just been handed what's
22 marked Exhibit 43. Do these appear to be e-mails
23 that you exchanged with Christina Canales?

24 A. Yes, ma'am.

25 Q. So turning back to COLLIN page -- the

1 just they give the correct verbiage as to what to
2 request.

3 Q. Okay. You also allege in your Amended
4 Complaint that none of the accommodations would have
5 caused an undue hardship.

6 What's your personal understanding of the
7 phrase "undue hardship"?

8 A. That it wouldn't require a financial cost
9 or anything they would have to -- like, reconstruct
10 anything.

11 Q. And how do you know what would or wouldn't
12 have caused a hardship for Collin College?

13 A. How do I know?

14 Q. Yes, ma'am.

15 A. Because according to the description, the
16 hardship wasn't financial of what was being asked
17 for. There was no financial cost behind those
18 requests.

19 Q. So turning back to the exhibit with your
20 e-mails, the e-mails that you exchanged with
21 Ms. Canales about your September 29th accommodation
22 request -- and I think this is what you were
23 pointing me to earlier, on Tuesday, December 7th,
24 Ms. Canales sought clarification from you about your
25 request for a modified work schedule, correct?

1 A. Yes, ma'am.

2 Q. And you responded the modified work
3 schedule would be 8:00 to 5:00 work schedule for
4 days I'm not teaching or to not have morning
5 classes.

6 How did that differ from what you were
7 already doing?

8 A. (Reviews document.)

9 (Speaking in sotto voce.)

10 I don't know.

11 Q. And you also said that part of your
12 modified schedule request was teaching modality for
13 feasible courses. What does that mean?

14 A. The modality meaning whether teaching it
15 online or in -- on campus.

16 Q. Okay. So you wanted the ability to teach
17 online if you needed to?

18 A. Yes, ma'am.

19 Q. Okay. And you allege in your Amended
20 Complaint that this interactive process with
21 Ms. Canales constituted or created a hostile work
22 environment.

23 Again, how was -- this exchange of
24 information with Ms. Canales, how was this harassing
25 to you based on your disability?

1 Q. Was it before class or after class?

2 A. It was before class was starting. Everyone
3 was coming in.

4 Q. Was anyone else present for that
5 conversation?

6 A. Yes.

7 Q. Who else?

8 A. Simon, Taylor, and Gabriel, Gabe.

9 Q. Were they all students?

10 A. Yes, ma'am.

11 Q. Did any of them speak during the
12 conversation when Stephanie was talking?

13 A. Yes.

14 Q. Were any of them else present when
15 Stephanie claimed she had this conversation with
16 Hatem?

17 A. No.

18 Q. So were Simon, Taylor, and Gabriel just
19 kind of listening as Stephanie told you her story?

20 A. Listening and asking questions.

21 Q. Okay. And Stephanie didn't say that Hatem
22 had said anything about your disabilities, did she?

23 A. No.

24 Q. Did you ask Hatem about the conversation?

25 A. I did not.

1 didn't matter because I was going to go ahead and
2 resign.

3 Q. So you don't know what the discipline was
4 about?

5 A. No.

6 Q. Was it a disciplinary notice like the ones
7 we have looked at before, like, the first warning
8 and the second warning?

9 A. Yes, ma'am.

10 Q. Okay. So it was another disciplinary
11 notice?

12 A. Yes.

13 Q. But you didn't read it?

14 A. No, ma'am.

15 Q. Did you -- and so you told them it doesn't
16 matter, I'm not going to sign it because I'm
17 resigning?

18 A. Yes.

19 Q. Okay.

20 (Exhibit No. 49 marked.)

21 BY MS. KUELBS:

22 Q. Okay. You were just handed what's been
23 marked as Exhibit 49. Is that your resignation
24 letter?

25 A. Yes, ma'am.

1 Q. Did you write that resignation letter?

2 A. Yes, ma'am.

3 Q. Did you write it before your January 28th
4 meeting with Dean Millen and Hatem?

5 A. Yes, ma'am.

6 Q. So you knew going into the meeting on
7 January 28th that you were going to resign?

8 A. Yes, ma'am.

9 Q. Does this letter encompass all of the
10 reasons for your resignation?

11 A. Yes, ma'am.

12 Q. Okay. If we can go back to Exhibits 3 and
13 4 for a moment, your interrogatory responses.

14 So Interrogatory No. 3 in Exhibit 3 asks
15 you to describe in detail all facts that support
16 your contention that the college discriminated
17 against you because of your disability.

18 Does your answer contain all of the facts
19 that support your contention that the college
20 discriminated against you based on your disability?

21 A. You said Exhibit 3, page 3?

22 Q. Yes.

23 A. Under which number?

24 Q. Page 6, page 6 and 7.

25 A. Yes, ma'am.

1 under oath?

2 A. Yes, ma'am.

3 Q. Can you turn back to Exhibit 42, please,
4 which is your September 29th, 2021, accommodation?

5 Okay. Sorry. And do you see at the top
6 under "Accommodation requested by," it says CWID?

7 A. Yes, ma'am.

8 Q. What is that?

9 A. My employee ID.

10 Q. Okay. And if can flip back to Exhibit -- I
11 think it's 33, your complaint that you printed out
12 from June 10th, 2021. On the page that's marked 2
13 out of 9 under "Part 1: Complainant's Contact
14 Information," it says "CWID."

15 Do you see that CWID number that you saw
16 on Exhibit 42?

17 A. No, the EEOC blocked this out.

18 Q. The EEOC blocked that out? That's a
19 redaction?

20 A. Yes, that's from there. So I have the
21 original.

22 Q. So was your ID number on the complaint that
23 you submitted?

24 A. Yes, ma'am.

25 Q. Okay. And turning back -- just switching

1 gears for a moment, when you -- the recordings that
2 you submitted in connection with your Amended
3 Complaint, did you record the entirety of the
4 meetings that you had when you recorded the
5 meetings?

6 A. Yes, ma'am.

7 Q. Okay. Have you understood the questions
8 I've asked you today?

9 A. Yes, ma'am.

10 Q. And do you have any changes to your answers
11 to my questions?

12 A. No, ma'am.

13 Q. Any additional information that you may
14 have remembered in response to any of my questions?

15 A. No, ma'am.

16 Q. Have you given me honest and complete
17 answers to the questions I have asked you today?

18 A. Yes, ma'am.

19 MS. KUELBS: Okay. Thank you very
20 much for your time. And I will reserve further
21 questions at this time. Pass the witness.

22 MR. JOHNSON: I'll reserve my
23 questions for trial.

24 MS. KUELBS: I wore you out?

25 THE VIDEOGRAPHER: Before we leave,

Tiffani Neubel-Johnson * June 9, 2025

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION

3 TIFFANI N. NEUBEL-JOHNSON, *
Plaintiff, *
4 VS. * Civil Action No.
5 * 4:22-cv-1029-SDJ-BD
6 COLLIN COLLEGE, *
Defendant. *

7 REPORTER'S CERTIFICATION
8 DEPOSITION OF TIFFANI N. NEUBEL-JOHNSON
JUNE 9, 2025

9 I, CHRISTY R. SIEVERT, CSR, RPR, in
10 and for the State of Texas, hereby certify to the
11 following:

12 That the witness, TIFFANI N.
13 NEUBEL-JOHNSON, was duly sworn by the officer and
14 that the transcript of the oral deposition is a true
15 record of the testimony given by the witness;

16 I further certify that the signature of
17 the deponent was requested by the deponent or a
18 party and is to be returned within 30 days from date
19 of receipt of the transcript. If returned, the
20 attached Changes and Signature Page contains any
21 changes and the reasons therefor;

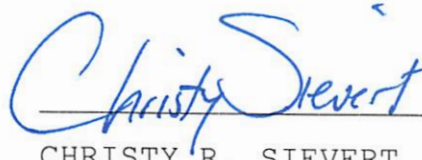
22 I further certify that I am neither
23 counsel for, related to, nor employed by any of the
24 parties or attorneys in the action in which this
25 proceeding was taken, and further that I am not

Tiffani Neubel-Johnson * June 9, 2025

Page 271

1 financially or otherwise interested in the outcome
2 of the action.

3 Subscribed and sworn to on this the 25th
4 day of June, 2025.

5
6
7 

8 CHRISTY R. SIEVERT, CSR, RPR
9 Texas CSR 8172
Expiration Date: 4-30-2027

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Usher Reporting Services
(214) 755-1612

EXHIBIT C

Service Dog Letter Needed

Christina Canales <ccanales@collin.edu>

Thu 3/25/2021 8:37 AM

To: (b)(7)(C) <(b)(7)(C)>

Hi Tiffani,

We are rounding out the first week of your employment so I wanted to follow up on the information we discussed on Monday.

At this time, I have **no** documentation that a service dog is needed due to an impairment. Please get me information as soon as possible that identifies the purpose of the dog and what duties the dog performs

Thanks,

Christina O Canales, MBA, MS
HR Manager, Benefits
Employee COVID Coordinator
3452 Spur 399, Suite 346
McKinney, Texas 75069

Ph (972) 599 3164

F: (972) 599-3156

Benefits Team

Ph: (972) 599 – 3152

Benefits@collin.edu

“Be still, and the world is bound to turn herself inside out to entertain you. Everywhere you look, joyful noise is clanging to drown out quiet desperation”. – Barbara Kingsolver



From: Tiffani Johnson
Sent: Friday, March 26, 2021 12:02 PM
To: Christina Canales <ccanales@collin.edu>
Cc: Tiffani Johnson <TNJohnson@collin.edu>
Subject: FW: service dog letter

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Tech Processor/ Coordinator
Office #: 972 553 1127
TNJohnson@Collin.edu

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From: Tiffani Neubel-Johnson <(b)(7)(C)>
Sent: Friday, March 26, 2021 11:56 AM
To: Tiffani Johnson <TNJohnson@collin.edu>
Subject: service dog letter

CAUTION This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

Per the request please the attached letter for my service dog.

Tiffani Neubel-Johnson, AA, CPhT, CPP
Cell: 469-389-0688
[Click Here ---->Book an Appointment](#)

EXHIBIT D



To Whom It May Concern:

April 28, 2020

Mrs. Tiffani Neubel-Johnson is under my care, I'm familiar with her history and limitations imposed by her disability and mental health condition. Tiffani meets the definition of disability under the Americans with Disabilities Act. Due to symptoms associated with her disability, Tiffani has certain limitations that substantially limit one or more major life activities. Her psychiatric service dogs significantly help in alleviating Tiffani's symptoms; therefore, the presence of these service dogs is necessary for Tiffani's Disability and Mental Health.

Tiffani has been diagnosed with a lifetime of Neurobehavioral Impairments, Attention Deficit Hyperactivity Disorder (ADHD), Obsessive-Compulsive Disorder (OCD), Post Traumatic Stress Disorder (PTSD), and Major Depression Disorder (MDD). The symptoms and psychosis associated with these are specific to each patient. The challenges that require her service dogs are but are not limited to Distractibility, compulsive thoughts and behavior causing uncontrolled anxiety, difficulty remember basic self-care, difficulty with time management, the need for consistency, and post-traumatic stress.

Tiffani has two service dogs that separately perform different job duties, which will increase work productivity, improve the ability to focus, and reduce anxiety and other psychosis behaviors.

Species	Breed	Condition	Job Duties
Dog	Rottweiler	PTSD	<ul style="list-style-type: none">• Trained to create social distance between her and others, and Pressure therapy• Minimize social anxiety in larger crowds.
Dog	Yorkie	ADHD & OCD	<ul style="list-style-type: none">• helps alleviate compulsive thoughts and behavior, need for consistency, time management, and improve basic selfcare.• Traveling away from home

**Please note, Tiffani does not require both dogs at once. However, there may come a time for her to have two Yorkies at the same time, due to one dog retiring and the other dog training as the replacement. The dog in training will be less than 2 years old.*

Please allow Tiffani to be accompanied by her dog(s) into your establishment, into the cabin of the aircraft per your airline access, or place of employment according to company policy. The patient has been provided with a copy of her complete psychological evaluation report.

A handwritten signature in black ink, appearing to be "Haresh Boghara".

Haresh Boghara, MD

EXHIBIT E

Christina Canales

From: cougarhr@collin.edu
Sent: Wednesday, April 7, 2021 1:16 PM
To: Christina Canales; Jay M. Rogers; Benefits
Subject: Reasonable Accommodation Request

WARNING: The sender of this email could not be validated.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

Accommodation requested by:

CWID : 100588255

Full Name : Tiffani Neubel-Johnson

Contact Phone Number : 7732161788

Email Address : TNJohnson@collin.edu

Full or Part Time: Full-time

Faculty or Staff: Faculty

Semester for Request : 260 Professor

Preferred Communication Method: TNJohnson@collin.edu

Supervisor Name: Hatem Aboalam

Supervisor Phone Number: 972-549-6393

Date : 04/07/2021 13:16:05

A. Question to clarify accommodation requested.

Accommodation requested : To be accompanied by service dog(s) at work.

If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore :

Yes

Explanation :

Is your accommodation request time sensitive : Yes

Explanation :

B. Questions to document the reason for accommodation request.

What, if any, job function are you having difficulty performing : Anxiety, self-care, difficulty with time management, the need for consistency, and social interactions.

What, if any, employment benefit are you having difficulty accessing :

What limitation is interfering with your ability to perform your job or access an employment benefit:

Have you had any accommodations in the past for this same limitation: Yes

If yes, what were they and how effective were they: Service Dog, telecommute 2 days per week, an office away from high traffic areas, without glass windows or door, which can be shut to prevent distractions and disruptions. These accommodations were very effective.

If you are requesting a specific accommodation, how will that accommodation assist you : This accommodation will

increase my work productivity, remember self-care, improve time management, compulsive behavior, and reduce social anxiety.

C. Other.

Please provide any additional information that might be useful in processing your accommodation request : I keep a copy of the psychological evaluation and a letter from my Physician handy, in case it's requested.

D. Acknowledgements

I understand that I am responsible for providing documentation of my disability that supports this request for accommodation(s). I understand my request for accommodation(s) will be discussed in a collaborative manner with my supervisor and, if necessary, other appropriate Collin College personnel. I understand that if, in the future, the nature of my disability or my work assignment changes, I have the right to request other accommodation(s):

Yes

I understand that I must provide documentation from an appropriate health care professional to establish my eligibility as a person with a disability. I further understand it is my responsibility to sign the necessary release forms with that individual and have my documentation sent to:

Christina O. Canales
Manager, HR Benefits
Collin County Community College District
3452 Spur 399
McKinney, TX 75069
(972) 599 - 3164
Fax: (972) 599 - 3156:

Yes

EXHIBIT F

Christina Canales

From: Tiffani Johnson
Sent: Thursday, April 8, 2021 3:35 PM
To: Christina Canales
Cc: Hatem Aboalam; Christy Phoenix
Subject: RE: Decision - Job-Related Reasonable Accommodation - Johnson, T.

Ok, Thanks.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christina Canales
Sent: Thursday, April 8, 2021 3:13 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Decision - Job-Related Reasonable Accommodation - Johnson, T.

Hi Tiffani,

That should be sufficient. I do not anticipate needing to take any additional steps unless someone comes back with having severe allergies.

Thanks,
Christina

From: Tiffani Johnson
Sent: Thursday, April 8, 2021 12:58 PM
To: Christina Canales <ccanales@collin.edu>

Cc: Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Decision - Job-Related Reasonable Accommodation - Johnson, T.

Hi Christina,

Thank you very much!

I've included the link to the signed document below.

Questions: In the past, I've simply asked if anyone had dog allergies, should I do the same here at Collin or is there some specific I have to do?

https://adobefreeuserschannel.na1.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLbIqZhD_pmsHoPgIOOIr4zSV7SL1OupWZD8juoH9ao11SVFD3Uqkd2QpeXzebl1XDeZ-5cl%2A

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christina Canales
Sent: Thursday, April 8, 2021 12:29 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: Decision - Job-Related Reasonable Accommodation - Johnson, T.
Importance: High

Hi Tiffani,

Please review the attached accommodation document. This outlines the request you submitted along with what we are approving and not approving. You will also find a copy of your job description which can be used for reference.

Let me know if you have any questions.

Thanks,

Christina O. Canales, MBA, MS
HR Manager, Benefits
Employee COVID Coordinator
3452 Spur 399, Suite 346
McKinney, Texas 75069

Ph: (972) 599-3164
F: (972) 599-3156
Benefits Team
Ph: (972) 599 – 3152
Benefits@collin.edu

"Be still, and the world is bound to turn herself inside out to entertain you. Everywhere you look, joyful noise is clanging to drown out quiet desperation". – Barbara Kingsolver



Help Stop COVID 🦠 COLLIN CARES

EXHIBIT G

Neubel-Johnson, Tiffani – Accommodation A.1



April 6, 2021

Tiffani Neubel-Johnson
2615 Summerview Lane
Lancaster, Texas 75146

Re: Requested Job-Related Reasonable Accommodation – Current Position: Professor, Pharmacy Tech

Sent via: Electronic Mail to tnjohnson@collin.edu

Ms. Neubel-Johnson,

The accommodation you made me aware of on March 22, 2021, during New Employee Orientation has been reviewed. Based on the information provided as of the date of this letter the following has been identified:

- Use of service dog(s) as needed – two might be needed at the same time

The following accommodation has been partially approved by the College based on your request and the information supplied by your healthcare provider:

- Use of service dog while in your capacity as Professor, Pharmacy Tech, while on Collin College premises. Interactions with students, while in the faculty office, will need the addition of a prescreening for allergies and to evaluate the student's comfort level to animal exposure. While Yorkies are known to be low to hypoallergenic, the risk still exists that someone may have an allergy.
 - We are not able to guarantee the use of a service dog with certain situations and/or visiting offsite locations. This includes the following possible situations and/or locations:
 - During visits to healthcare institutions, including but not limited to hospitals, pharmacies, long-term care facilities, senior care homes, and compounding pharmacies, the nature of your visit along with their own policies may limit where a service dog can be. Sterile environments will need to be confirmed before the expected visit.
 - While visiting students in rotations, the environment may need to be kept sterile therefore limiting use of anything not sterilized.
 - Two courses/labs (PHRA1349 and PHRA1445) require completely sterile environments to teach students about sterile compounding
 - Visits to an independent school district (ISD) will require communication with ISD point-of-contacts and/or leadership to verify their policy(ies) and any prescreening for allergies before meeting with a teacher and/or advisor.

Collin County Community College District

Collin Higher Education Center | 3452 Spur 399, McKinney, Texas 75069

P | 972.599.3100 | www.collin.edu

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Neubel-Johnson, Tiffani – Accommodation A.1

Please review this carefully and sign on page 2 that you accept the accommodation as presented if you are accepting as presented. If you are not accepting the accommodation as presented, you may sign that you are denying it, as presented. Next steps will then be taken regarding items not approved or items not able to be satisfied.

Collin College is committed to supporting you through the accommodation process and we are available to answer any questions you have as you move forward. If you have any questions, please contact me at 972-599-3164.

Sincerely,



Christina Canales
HR Manager, Benefits
Collin College

Enclosure

C: Hatem Aboalam, Director of Pharmacy Tech Program
Christy Phoenix, Human Resources Generalist

I, Tiffani Neubel-Johnson, acknowledge receipt of this approval and respond as follows:

_____ I accept the accommodation as presented.

_____ I do not accept the accommodation as presented.

X

Tiffani Neubel Johnson
Professor

Date

EXHIBIT H

Tiffani Johnson

From: Hatem Aboalam
Sent: Wednesday, March 31, 2021 12:13 PM
To: Tiffani Johnson
Subject: Program Goals
Attachments: Submitting budget and finding out supplemental if needed 4.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Here are the program goals.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

EXHIBIT I

Tiffani Johnson

From: Hatem Aboalam
Sent: Tuesday, April 6, 2021 10:41 AM
To: Tiffani Johnson
Subject: Helpful Info
Attachments: 90 Day Checklist v2.docx; Getting Started with College Teaching.pdf; Glossary of Academic and Collin College Terminology.pdf; Professionalism in the Academic Environment.pdf

I put together some helpful info for new faculty on board.

Enjoy!

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
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2550 Bending Branch Way
Allen, TX 75013
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Haboalam@collin.edu

EXHIBIT J

Tuesday, May 11, 2021 at 01:40:07 Central Daylight Time

Subject: RE: Follow up on tasks
Date: Tuesday, April 27, 2021 at 8:35:30 PM Central Daylight Time
From: Tiffani Johnson
To: Hatem Aboalam
BCC: Christy Phoenix
Priority: High
Attachments: image006.jpg, image007.jpg, image008.jpg, image002.jpg

Hi Hatem,

You responded to my email, as if I haven't been taking care of my work responsibilities or follow-through on assigned tasks, when in fact, I've beaten the given deadlines or still waiting for the assistance of someone else. Please see my responses to your statements below.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Thursday, April 22, 2021 4:43 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Follow up on tasks

Tiffani,

I appreciate your honesty, and I expect nothing less!

I need you to know that the last thing I want is to stress you out as we both work in the same program, and any action taken based on stress will not have a good outcome for our program.

I needed you to work on the following three things mainly:

1-page set up, which we initially had set for 4/6, and anything we edited or added was a few words or lines.

[Tiffani Johnson]

The page set up had multiple due dates, which were out of my control.

The page set was assigned on 3/29, and I submitted it to you for review on 4/5. You didn't review it with me until and gave a new due date unit 4/7 & 4/8. However, that due date of 4/14, pending we would receive the website training from Rajesh by Friday 4/9 or Monday 4/12. I inquired about the training on 4/12; there was no discussion about the web page until 4/19 when we received a training confirmation scheduled for 4/27. The day before (4/21), You requested a meeting at 2-2:30; I asked to move it up to 1:30 – 2 pm because I had to pick up my boys by 3:30 pm.

Nevertheless, you insisted I have the application and page set up done by the end of that business day when I needed to leave at 2:15. In addition, and to my surprise, you told me to develop a contingency plan and have it ready by 5/5, which initially wasn't due until 5/20. See my other contingency plan comments below.

2-The application process was almost complete when I shared it with you; you just needed to check for any accreditations requirements. That was due 4/15, and we did not need to add anything except few lines that I needed to add today.

[Tiffani Johnson]

I don't think you real the amount of time it takes to carefully review information for accuracy, especially when it's going to be publicly published. More importantly, the 4/15 due would have been impossible to meet if I was out sick 4/14 – 4/19.

Since I started, with each task or project, you've given them to me without any additional information or resources related to Collin College other than referring me to the Cougarweb. As it relates to the page-set and the application, what you thought was "almost complete" still had a lot of work done due to Collin's marketing policies. Meaning, I had to find other official information about Collin's Publication and further details like logos, colors, and wording. It takes more than "a few words or lines" to make updates.

3-The lab needed to be ready on 4/20, I just visited it, and it sure looks like it still needs plenty of work; baskets are everywhere, and nothing is close to ready yet, even though you said you have been working on it till 8 pm on Tuesday. It looks rougher than it was when I saw it Monday. You mentioned it would be ready by the end of today, and you had your calendar marked that you are leaving today at 2:15 pm, so I needed to check as we have the open house on Saturday, and you will not be here tomorrow so that you can make the hours up.

[Tiffani Johnson]

I would have hoped you did not think I would leave the lab as it was, knowing I wasn't going to be here the day before the open house. I had to sort and organize all the stuff I brought with me by myself to clear out all the bags and boxes you didn't want sitting around; it took longer than expected. So yes, I was here until 8 pm on Tuesday as I am every Monday and Tuesday.

As I stated in my previous email, "Please note, I will not miss any deadline, and if I foresee that to happen, I will surely let you know." You asked (told) me to grant you access to see the details of my calendar, which resulted in you misinterpreting my calendar. Therefore, you were unaware of the arrangements made earlier that morning for someone else to pick up my kids to hold to the previous statement.

Nothing was due till 5/5, which was the contingency plan, and you mentioned that you already have it, and it is a matter of copy and paste.

[Tiffani Johnson]

When I first learned of the Contingency Plan, it was due 5/20. After explaining to me what that was, You said, "you don't; have to worry about it; that's on me, not you." I offered to help because I had to convert my previous program 100% online when covid began. However, I did not say I already had a contingency plan written down or typed up; I said I already had the Program Learning Outcomes (PLOs) that could be copied and pasted. In any case, anything I already have from my former program that can assist with this program has to be vetted and aligned with Collin College. The foundation of my previous work will be a great asset to

this program; however, it was written based on the vision and mission of another College.

The student handbook did not have any due date; I just asked you when you can have it ready.

[Tiffani Johnson]

Correct, there was not a due date for the student handbook. When I said it was 35 pages, that would take me some time to go through because you wanted to give the same deadline as the application and web page set. In turn, You said I could wait until the end of May or the beginning of June to start on it because the students wouldn't need it until August.

When I looked at your calendar, I realized that you have a considerable number of external involvement during your workday that conforms to almost 10 hours of your office hours in one day. The expectation is that any involvement you have or leaving early to pick your children up will need to be done outside your 40 hours/week or made up for in the latter case.*[Tiffani Johnson]*

This paragraph is the second instance in this email; you have misinterpreted my calendar information to insinuate poor performance. It's clear that you exaggerated by saying, "... almost 10 hours of your office hours in one day." April 9-11, I was attending a conference for our state pharmacy association which is required, per our accreditation. For the entire month of April, my external involvement equates to 5.5 hours. Since my second week, I have worked more than 40 hours per week, including leaving early to pick my children. I distinctly remember you, the hiring committee, and Dr. Millin being well aware of my "**considerable number of external involvement.**" During my interview, Dr. Millin stated, "It is an expectation that faculty, staff, etc., are involved with the respective programs association and professional development." The activities from last week were commitments made before my hire.

You mentioned me doing things outside my workweek hours; however, you are dismissive of my time outside of work. On April 7th, you saw on my calendar that I was busy at 6 pm, and you ask me to join a virtual conference call anyhow. I told you I had to be at church and that it was at the same time I had to be there. I felt pressured into being on the call, and as a new employee, I wasn't comfortable saying no. After I agree to join for the first 30 minutes, you disclosed that you would be finishing up soccer practice, and you would join after that. That's not fair to interrupt my church life and drop everything for a last-minute work request. No one interrupts your daily prayer time, and that day you certainly didn't interrupt your son's soccer practice.

Please note that we are on a time-sensitive mission to launch our program by August fully, and that was mainly the reason we brought you on board based on your credentials and experience.

[Tiffani Johnson]

You have consistently reminded me of the time crunch to be ready for the fall 2021 semester. "**the reason we brought you on board based on your credentials and experience.**", my external involvement has contributed significantly to my credentials and experience.

Your job description and responsibilities were advised to you to look upon Collin's page per our meeting on 4/8, and we had few conversations about it; please let me know if there are things still that are not clear.

[Tiffani Johnson]

As mentioned, I did look over my job description and your expectation for "my external involvements to take place outside of my 40 hours/week", which contradicts my job summary and essential duties and responsibilities. Relative to my external involvement, the Job Summary, Essential Duties and Responsibilities states,

"Establish professional relationships with respective industry partners to enhance student job and career readiness."

"Actively participate in initiatives to maintain college-wide accreditation as well as maintaining standards required for discipline program review, accreditation and/or approval."

"Maintain current knowledge and competence in the appropriate academic or workforce disciplines by engaging in industry networking events, meetings, job site visits, and conferences."

These statements are precisely what my external involvements consist of. If I misunderstood those statements or Dr. Millin, please let me know who I can speak with for clarification in HR. In addition, there are things still unclear about your expectations for me; the differences in the projects you give are my primary duties, yours that I am assisting with, and which has priority over the other. In the meeting on 4/8, you told me my job title said one thing, but I was more like the faculty/program coordinator, and my duties were everything except budgeting, meeting, and the director title. I said there has to be some separation because I don't want to step on your toes while trying to do my work; you referred me to my job description. I clearly stated regarding my disability, I need structure, separation of my task verse yours. I said this would help me prioritize work, time management, and productivity. Meaning, am I responsible for doing book adoptions, building courses, etc.. your response was, "it's whatever I give you." Again, I'm the new employee and don't want to upset anyone.

I am very much aware that some of the projects you give me are the Director's responsibilities per ASHP and your job description. For instance, you had me put together information and build an entire web page in word to prepare for input after we receive training. But your job description says it is a part of your essential duties and responsibilities to **"Create and distribute program information intended for recruitment and program promotion"** Yet, I feel criticized for not meet your impossible deadlines, be available at your beck and call. I have no problem with assisting you on any project, but you cannot expect me to meet short deadlines that you aren't helping me with. I would find it insulting if you give your projects and assign them to me as my "other duties assigned." And submit it as your work. You emailed Rajesh and said, **"I finished the page set up..."** meaning you Haten finished it when all you did was read it and offer a few suggestions.

I Have been asking and talking about canvas training and working on my curriculum since day one, but you've had me busy doing all these other things. When the time comes for me to have it completed before the fall semester starts, I won't be ready. I need time to learn this system and get comfortable with the platform, or you will cause me to have a psychosis.

Next week, let us meet on Thursday, 4/29, at 11 am to discuss your first-month assessment and confirm your complete understanding of your job.

[Tiffani Johnson]

When I initially read this email and got to this statement, I saw this as passive-aggressive. You tried to intimidate me by using my 30-day evaluation as a threat. The day you sent this email was my 30th day, no evaluation mentioned before, yet you chose this email to schedule it.

My door is always open; feel free to reach out anytime for questions or concerns.

[Tiffani Johnson]

I didn't see this as a genuine statement but as sarcastic

[Tiffani Johnson]

I am very much aware of the amount of pressure on you regarding this program, so I consistently write things down and take notes. I can't say it enough; I'm here to help, but you can't dump enough off on me, and at the same time, I have a job to do as well, and that's being prepared to teach five courses in a few months.

This email confirms my suspicions that I have no room for error, and you are expecting me to be perfect. I'm willing to let this go and move on if you are will to control your emotions and listen to me when I say this is too much or "you stressing me out." As my supervisor, your first response should not have been to attack me. An effective response should have been, is there anything I can do to help and follow through with assisting me.

I am a natural leader and have always been a trusted employee because I have high regard for integrity, which means I don't need to be micro-managed or pushed around to do my work. If this can not be resolved and we move on without any ill-feeling or intent; We both need to re-evaluate if this is the right place for me. Your knit-picking and passive-aggressive emails are making me highly uncomfortable.

If this email has upset you any further, I ask a third person to sit in on my evaluation on Thursday.

I'm looking forward to putting this behind us!

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu



From: [Tiffani Johnson](#)
Sent: Thursday, April 22, 2021 1:46 PM
To: [Hatem Aboalam](#)
Subject: RE: Follow up on tasks

Please allow me to be open and honest, you are about to stress me out.

I shared my calendar this morning. I may have to restart it or something.

I have not looked at the handbook because you said that could wait until June.

The lab will be ready before I leave for the day.

You gave me several hard stop deadlines that I'm currently working on, plus the additional things you throw at me.

Please note, I will not miss any deadline and if I foresee that to happen I will surely let you know.

This is why I asked about my job responsibilities and your expectation of me, so that I can prioritize and manage my time and productivity.

I have 3 projects due by the end of business today, please allow me the allotted time to work on these projects within the time given.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Thursday, April 22, 2021 12:06 PM
To: Tiffani Johnson <njohnson@collin.edu>
Subject: Follow up on tasks

How is the lab coming? I will be on campus soon to look at it.

One thing I will add to the promotional table is a registration sheet to capture anyone who is interested to join the program and attend info sessions. I will work on that to have them write name and email to involve them in the info sessions.

Have you ever got a chance to go through the student handbook I sent you on 4/8 and determined any conflicts or things need to be added that is aligned with the accreditation? Let me know a date when you can have that ready please.

I still see your calendar not fully disclosed, could you please share your calendar.

Thank you

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

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Office: A210F
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Haboalam@collin.edu

EXHIBIT K

Tuesday, May 11, 2021 at 01:35:20 Central Daylight Time

Subject: RE: Quick Discussion
Date: Wednesday, May 5, 2021 at 12:36:12 PM Central Daylight Time
From: Tiffani Johnson
To: Christy Phoenix
CC: Maxine Walker
Attachments: image001.jpg, image003.jpg, image004.jpg, image005.jpg, image006.jpg, image007.jpg, image008.jpg, image009.jpg

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R., CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christy Phoenix
Sent: Wednesday, May 5, 2021 11:26 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Maxine Walker <mmwalker@collin.edu>
Subject: Re: Quick Discussion

Tiffani,

It is expected for you to work a 40 hour work week. Typical schedule is 8am-5pm---- this is with an hour lunch.

If you need to adjust the hours please work with your supervisor.

From: Tiffani Johnson <tjohnson@collin.edu>
Sent: Tuesday, May 4, 2021 8:37 PM
To: Christy Phoenix <cphoenix@collin.edu>
Cc: Maxine Walker <mwalker@collin.edu>
Subject: RE: Quick Discussion

Hi Christy,

"At Collin we encourage a working environment where employees have a sense autonomy in the workplace."

This statement keeps running through my head because that's what my environment feels like, more like being micro-managed. Is it appropriate to ask, what does autonomy look like here at Collin? I feel like I'm walking on eggshells over here.

"Correction on that schedule time, it would be 8-4 without you taking lunch. 8-5 is the scheduled time per HR giving you would take a lunch break."

This was Hatem's reply regarding my schedule while I'm not teaching.
The 9am – 5pm you mentioned is that with or without a lunch?
If I take a lunch, I have to work 9am – 6pm?
Are we allowed an hour for lunch?

I apologize if these questions seem tedious; however, this is what I'm dealing with. Although I was close to 50 hours/week, I have to account for every minute and hour of my workdays. In this case, I should be punching the time clock as a salaried employee.

I have so much other important work I could be doing for this program; instead, I'm emailing to confirm my exact work hours, so I don't make the mistake of stepping outside the box. I didn't sign-up for this.

Five days a week:

My kids don't see me until 6:30 – 7pm because I leave before they wake up for school.
I drive an hour, sometimes more, to and from work, without complaining.

I choose to make these sacrifices because I thought I was coming to work in a student-centered, healthy, positive, and inter-professional work environment. Besides Hatem passing through the breakroom area, I have not seen my supervisor since the open house, and he only communicates with me via email.

I haven't made it through my 90 day grace period, and I'm already tired. This situation is wearing me down more than my work commute.

You told me not to get discouraged; how can I not be?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TJohnson@Collin.edu



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From: Christy Phoenix
Sent: Tuesday, May 4, 2021 11:39 AM
To: Tiffani Johnson <tjohnson@collin.edu>
Cc: Maxine Walker <mmwalker@collin.edu>
Subject: Re: Quick Discussion

Hi Tiffani,

This is great that you took the initiative to reach out to Hatem to address the email sent on Tue, 4/27/2021 8:35 PM.

I believe you are scheduled to meet with Hatem and Dean Millen this week and you can get further clarification on your schedule and the pending questions.

Is my commute included in my scheduled work hours? No, it is not.
My classes are scheduled from 8 am to 4 pm, which leaves no time for me to work with students after class. Is it too late to adjust the class times? What would you suggest?
They can meet with you before class or adjust your schedule to 9am-5pm. You are Salary Exempt Employee. An exempt employee is not-eligible to receive overtime pay.

Thanks,
Christy

From: Tiffani Johnson <njohnson@collin.edu>
Sent: Monday, May 3, 2021 2:33 PM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Quick Discussion

Hi Christy,

Thanks again.

Here is an update since our meeting. The day after we met, via email, I made the following request and suggestion:

Schedule calendar meetings to discuss projects and work assignments; establishing a reoccurring weekly one-on-one meeting

Follow up after each meeting with an email to confirm what was addressed and get any clarification

Work hours and schedule.

I copied the email I sent regarding the meetings below:

Do you have at least two days on your calendar that will allow us to schedule weekly meetings to discuss the program, projects, etc., and the second day as a follow meeting? (or) Meet every other week and do follows every Friday?

We can call it our power hour and follow-up Fridays.

I prefer the latter of the two because it will allow me time to work. Follow-up Fridays will also let me ask questions or inform you of any concerns or roadblocks I may have; more importantly, it keeps you knowing what I'm working on and progress toward meeting our goals.

After our next meeting (one month assesment), I will begin to do so on 5/5 @11am - 12pm.

He did approve via email my work hours 8a - 4p without lunch and 8a - 5p with a lunch. Now I'm waiting for the answers to the following questions.

Is my commute included in my scheduled work hours?

My classes are scheduled from 8 am to 4 pm, which leaves no time for me to work with students after class. Is it too late to adjust the class times? What would you suggest?

Tiffani N. Neubel-Johnson, AA, CPh.T.R., CPP
Pharmacy Technician Professor
Office #: 972-553-1127
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From: Christy Phoenix
Sent: Friday, April 30, 2021 2:12 PM
To: Tiffani Johnson <njohnson@collin.edu>
Subject: Re: Quick Discussion

Oh No! But its Friday

Here you go....

Have a great weekend!
Christy

From: Christy Phoenix <cphoenix@collin.edu>
Sent: Thursday, April 29, 2021 2:59 PM
To: Tiffani Johnson <njohnson@collin.edu>
Subject: Re: Quick Discussion

Hi Tiffani,

Absolutely!

It was my pleasure to assist.

Feedback

After review of email, I recommend the following to assist you in your new role.

- Schedule calendar meetings with Hatem to discuss projects and work assignments. Recommend establishing a reoccurring weekly one-on-one meeting.
- Follow up after each meeting with an email to confirm what was addressed and get any clarification.
- Regarding your work hours and schedule. You shared that you are leaving at 2:15pm twice a week. Has this been approved by Hatem? Recommend working with Hatem and based on the business need, the request may not be approved. If needed, go through accommodation process if applicable. As I shared with you, Collin does not have a work from home policy.
- Calendar---I suggested you separate your work calendar from your personal. Yes, you may have external events on your calendar as reminders, but these should be marked as available and not unavailable if the hours are within your regular work schedule.
- You suggested "Focus Time". Collin does not have a policy. However, my recommendation to you was that you should continue to work on communication with Hatem and through this relationship establish what works best for you to complete the assigned projects. For example, I work best when I am allowed the 1st 30mins of my day to check emails and return phone calls. Meetings, I prefer to be placed on calendar as I am working several projects and I have time allocated for each, this way I can ensure I am prepared for the meeting. At Collin we encourage a working environment where employees have a sense autonomy in the workplace.

Tiffani, this is a new program, you will experience some growing pain. Communication is key! Do not ignore or fail to reply to a directive or emails failure to follow-up can be viewed as insubordination. Reach out to colleagues for support and guidance to navigate you through the process and requests.

Hope this feedback helps.

Thanks,
Christy

From: Tiffani Johnson <tjohnson@collin.edu>
Sent: Thursday, April 29, 2021 8:46 AM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: Re: Quick Discussion

Good morning,

Just wanted to say thank you for being available and holding up to the person I thought you to be; which was to non-basis, honest, and, candid.

I appreciate the feedback that you pride from all prospectives. I plan to use every suggestion we discussed. When you get a chance, please send me a copy, because you had my pencil and couldn't take notes. Lol

Thanks again!

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu

On Apr 28, 2021, at 2:39 PM, Christy Phoenix <phoenix@collin.edu> wrote:

We can meet in person ---- Dean Coffman's Conference Rm. @ 3:30pm

From: Tiffani Johnson <tjohnson@collin.edu>
Sent: Wednesday, April 28, 2021 2:23 PM
To: Christy Phoenix <phoenix@collin.edu>
Subject: RE: Quick Discussion

Hi Christy,

Where would you like to meet?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tiffani Johnson
Sent: Wednesday, April 28, 2021 11:41 AM
To: Christy Phoenix <CPhoenix@collin.edu>
Subject: RE: Quick Discussion

Hi,

Anytime between 3pm – 5pm is fine with me. Thanks

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christy Phoenix
Sent: Wednesday, April 28, 2021 11:39 AM
To: Tiffani Johnson <tjohnson@collin.edu>
Subject: Re: Quick Discussion

Hi Tiffani,

I haven't had a chance to read through the email. My 3pm-5pm is still available. Let me know if this afternoon works for you. If so, confirm time.

Also Friday, I'm pretty open. Tomorrow I'll be in Plano @ Courtyard all day.

Please keep me posted.
Christy

From: Tiffani Johnson <tjohnson@collin.edu>
Sent: Tuesday, April 27, 2021 8:40 PM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Quick Discussion

Hi Christy,

I blind copied you on an email to Hatem. Once you read it, you'll understand my problem.

Thank you, and good night.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christy Phoenix
Sent: Tuesday, April 27, 2021 5:31 PM
To: Tiffani Johnson <tjohnson@collin.edu>
Subject: Re: Quick Discussion

Tiffani,

I need to reschedule... a meeting just popped up for me with Workday Training. I'm literally about to walk out the door I'll check calendar and get back to you tomorrow.

If I can be of any assistance via email, please let me know.

From: Tiffani Johnson <tjohnson@collin.edu>
Sent: Tuesday, April 27, 2021 5:20 PM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Quick Discussion

9:30 am and in person please.

So that you aware and understanding why I requested this meeting, I'm going to bcc you on an email I will be replying to shortly.

Tiffani N. Neubel-Johnson, AA, CPh.T.R., CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christy Phoenix
Sent: Tuesday, April 27, 2021 5:17 PM
To: Tiffani Johnson <njohnson@collin.edu>
Subject: Re: Quick Discussion

Great. Let's meet for 9:30am.

Would you like a Zoom or in- person meeting?

I have a meeting at 8:30am at Tech so I am available for an in-person meeting if you would like to meet the Conf. Rm.

Thanks,
Christy

From: Tiffani Johnson <njohnson@collin.edu>
Sent: Tuesday, April 27, 2021 12:30 PM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: RE: Quick Discussion

Yes Ma'am, I am available. Thanks.

Tiffani N. Neubel-Johnson, AA, CPh.T.R., CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christy Phoenix
Sent: Tuesday, April 27, 2021 12:29 PM
To: Tiffani Johnson <njohnson@collin.edu>
Subject: Re: Quick Discussion

Hi Tiffani,

I am booked with meetings the rest of the afternoon. However, tomorrow morning after 9am I am free until 11:30am and free again after 3pm.

Please let me know if you are available tomorrow.

From: Tiffani Johnson <njohnson@collin.edu>
Sent: Tuesday, April 27, 2021 12:10 PM
To: Christy Phoenix <cphoenix@collin.edu>
Subject: Quick Discussion

Hi Christy,

Do you have about 15 minutes today to discuss some concerns I'm having?
I have a training for the website from 2-3:30 pm today. Otherwise, I'm free before or afterward.

I appreciate any help you can provide.

*Tiffani N. Neubel-Johnson, AA, CPh.T.R., CPP
Pharmacy Technician Professor
Office#: 972-553-1127*

EXHIBIT L

Archived: Thursday, June 5, 2025 1:13:14 PM
From: Tiffani Johnson
Sent: Thursday, April 29, 2021 5:12:35 PM
To: Hatem Aboalam
Subject: Work Week Schedule
Importance: High
Sensitivity: None

Hi,

When I requested to work late on Monday and Tuesday to pick up boys on two other days, it was necessary only until my husband finished finals and graduation, which May 22nd.

I wanted to let you know I've made the necessary arrangement to have my boy pick up from here on out unless there is an emergency that requires me to do so.

When we meet, can we discuss and clarify the time for now through summer, then for fall. As Mechelle explained her schedule to assist me with mine, several questions came up.

- * Is my commute included in my scheduled work hours?
- * I've was told the standard work hours are 9 am to 5 pm; however, I believe my first class starts at 8 am, and the last class ends at 4 pm. Which am I to work?
- * My classes are scheduled from 8 am to 4 pm, which leaves no time for me to work with students after class. Is it too late to adjust the class times? What would you suggest?

I'm not expecting you to answer these now; It can wait until next.

Until then, I will be here from 8 am to 4 pm like we during my first week, if that's still okay with you?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office#: 972-553-1127
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2550 Bending Branch Way
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Office: A210B



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EXHIBIT M

Tiffani Johnson

From: Hatem Aboalam
Sent: Wednesday, May 5, 2021 9:00 AM
To: Tiffani Johnson
Subject: RE: CORRECTION***Doctor's Appointment

Thank you for the correction.

To confirm, this is the schedule for this current week, As your appointment is this Friday. Correct?

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu



From: [Tiffani Johnson](#)
Sent: Tuesday, May 4, 2021 8:39 PM
To: [Hatem Aboalam](#)
Subject: RE: CORRECTION***Doctor's Appointment

Monday 8 am – 6:30 pm (no lunch)
Tuesday 8 am – 8:30 pm (no lunch)
Wednesday 8 am – 6:00 pm (if no lunch – 5 pm)
Thursday 8 am – 6:00 pm (if no lunch – 5 pm)
Friday 8 am – 12:00 pm

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tiffani Johnson
Sent: Tuesday, May 4, 2021 7:01 PM
To: Hatem Aboalam <HAboalam@collin.edu>
Subject: RE: Doctor's Appointment

Monday 8 am – 6:30 pm (no lunch)
Tuesday 8 am – 7:30 pm (no lunch)
Wednesday 8 am – 6:00 pm (if no lunch – 5 pm)
Thursday 8 am – 6:00 pm (if no lunch – 5 pm)
Friday 8 am – 12:00 pm

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Tuesday, May 4, 2021 6:02 PM

To: Tiffani Johnson <tnjohnson@collin.edu>

Subject: Re: Doctor's Appointment

Tiffani,

Let me know how would you like to adjust the hours for the next few days to accommodate your dr. Appointment.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program
Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson <tnjohnson@collin.edu>

Sent: Tuesday, May 4, 2021 3:41:47 PM

To: Hatem Aboalam <haboalam@collin.edu>

Subject: Doctor's Appointment

Hi,

I have a monthly doctor's appointment, and my next appointment is this Friday at 1 pm. I do not have any sick time; therefore, I would like to adjust my hours over the next few days to make up my time.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

Pharmacy Technician Professor

Office#: 972-553-1127

TNJohnson@Collin.edu

Collin College Technical Campus

2550 Bending Branch Way

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EXHIBIT N

Tiffani Johnson

From: Hatem Aboalam
Sent: Wednesday, May 5, 2021 4:30 PM
To: Tiffani Johnson
Subject: Follow up

Hello Tiffani,

Thank you for meeting with us today, I am hoping that now we have a better perspective on how we will move forward and have a better communication to help thrive the pharmacy technician program.

As mentioned in our meeting today we will have weekly meetings on Wednesday at 11 am to plan for the program goals. Unless you or me will have any conflicts with that time we can arrange for a different hour.

The expectations for the office hours would be Mon-Friday 8am till 5 pm. This serves the program better and help any collaboration to take place effectively. That could change on the future once we have established the program and things are run smoothly. Please communicate about any appointments ahead of time so we can better prepare.

Thank you.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu



EXHIBIT O



EMPLOYEE DISCIPLINE FORM

Employee Information			
Employee Name:	Tiffani N. Neubel-Johnson	CWID:	100588255
Job Title:	Faculty Staff	Department:	Pharmacy Technician
Full-time or Part-time:	Full-time	Exempt / Non-Exempt:	Exempt
Immediate Supervisor:	Hatem Aboalam	Date:	5/5/2021
Performance Status			
<input checked="" type="checkbox"/> Level 1 Warning	<input type="checkbox"/> Level 2 Warning	<input type="checkbox"/> Recommendation for Suspension	
Details			

List the employee's primary job responsibilities or behaviors that require attention and describe the specific improvement that is needed. (Include facts about events, dates, people, documents, etc.)

Job Performance/Behavior Deficiency:

Within the first 45 days of employment, Prof. Johnson has contradicted Collin College's mission statement and core values multiple times.

These incidents are summarized below:

Availability /Job description misinterpretation

1 -Dir. Aboalam did not see Prof. Johnson in her office until 11:38 am on 4/6/21. He texted Prof. Johnson asking if she is ok? Dir. Aboalam did not get a response back.

Dir. Aboalam had a conversation with Prof. Johnson about being responsive to know what she is working on for any collaborative work for the program that needs to be conducted.

2-On Monday 4/12/21 Dir. Aboalam spoke with Prof. Johnson about office hours again (as prior conversations were conducted on the hiring date, 3/22, and 4/6 as stated above) and emphasized on her being available in her office and responding to emails in a timelier manner as it is delaying program tasks and progress. Prof. Johnson acknowledged.

3-Prof. Johnson was not in her office on Tuesday 4/20/21 at 11:50 am and were not responsive to text message until the morning of the next day. It became a pattern of not being available in her office nor responsive to text messages hence, Dir. Aboalam conducted a one-on-one meeting on 4/21 with Prof. Johnson to address the issue.

4-Prof. Johnson's s calendar showed on the week of 4/19 the amount of 10.5 hours marked off for webinars and tasks. As much as Collin College encourages professional development, the expectation is that any non-program or Collin College related external involvements should be done outside job hours as was communicated to Prof. Johnson on 4/22/21 via email to clarify any misunderstanding.

Prof. Johnson stated in her email sent on 4/22/21 that "As mentioned, I did look over my job description and your expectation for "my external involvements to take place outside of my 40 hours/week", which

Changes to template verbiage must be approved by HR.

Supervisor Initials: *HA*

Employee Initials: *[Signature]*

HRC Initials: *[Signature]*

contradicts my job summary and essential duties and responsibilities. Relatives to my external involvement, the Job Summary, Essential Duties and Responsibilities states"

This statement shows failure to interpret the job description correctly. It was verbally communicated to Prof. Johnson on 4/8/21 to get familiar with the job description.

Noncompliance

- 1 On 3/31/21 Dir. Hatem Aboalam and Prof. Johnson had their first one on one meeting to plot out the program goals and assign tasks. Dir. Aboalam sent a follow up email on 3/31/21 confirming what was discussed in the meeting. This email also included details advising that the lab needed to be ready for the open house on 4/20 as a goal date.

And on 4/8/21 Dir. Hatem Aboalam and Prof. Johnson had the second one-on-one meeting to follow up on goals and address a few concerns. They talked about Prof. Johnson job description and Dir. Aboalam asked to start familiarizing herself with the Collin College atmosphere, mission statement, core values and the type of policies that are relative to her job duties and description. Prof. Johnson mentioned that she was confused on what her duties and tasks were as a faculty staff 260 even though it was clearly communicated to Prof. Johnson verbally on the first one on one meeting on 3/31.


Dir. Aboalam explained and encouraged her to do the "Faculty start line" training and go through it to be more familiar with her job description and tasks. Prof. Johnson confirmed that she knew what the faculty start line was and she would start working on it. Dir. Aboalam had also sent 4 attachments on 4/6/21 which were: "90 days checklist," "Getting started with college teaching," "Glossary of academic and Collin College terminology," and "Professionalism in the academic environment." Considering the extensive information provided, Dir. Aboalam was concerned as to why prof. Johnson was still confused on her job description after two weeks of being on board and having a communication about it twice on 3/31 verbally and on 4/6 by sending resources.


Then on 4/21/21 Dir. Hatem Aboalam had to conduct a 3rd one-on-one meeting to clarify the expected office hours and to establish a better way to communicate with Prof. Johnson. Hatem handed Prof. Johnson a copy and emailed her a faculty template that states office hours and Hatem emphasized that it is a requirement for faculty to have that posted on the office door. Prof. Tiffani mentioned that she would work on that and have it ready by the end of the same business day. When Hatem followed up the next day, he did not see it posted. It was posted on 4/27 after Hatem sent a follow up email asking Prof. Johnson to post it. This is a recurrent issue where Prof. Johnson fails to follow clearly outlined instructions, delays task due dates, and does not follow Collin College policy. Dir. Aboalam also sent more resources on 4/28 via email including the faculty handbook.

Prof. Johnson's lack of proactivity and her repeated unprofessional behavior has created a negative environment to work within at Collin College. Prof. Johnson had previously stated that she was a natural leader and did not need to be micromanaged. However, Dir. Aboalam, as her direct supervisor is confident that a "team player" ability is required for the program to thrive.

Changes to template verbiage must be approved by HR.

Supervisor Initials: 

Employee Initials: 

HRC Initials: 

The constant back and forth that has taken place in the past 6 weeks has not only created more obstacles for a new program that is supposed to be launched in few months but has also shown Prof. Johnson to be uncompliant with regards to her job duties.

Specific Results Required for Acceptable Improvement:

Professor Johnson is expected to perform job duties efficiently and effectively on a consistent and ongoing basis. Professor Johnson will need to provide details on deliverables and results to each of her action items during weekly meetings and email updates. Professor Johnson must comply with all directives and/or responsibilities that has been assigned to her by Dir. Aboalam.

Failure to show immediate improvement in her job performance or behavior by stated deadlines and/or any future violations of the same or similar nature will subject you to further disciplinary actions.

Date for Improvement to be completed: Immediate improvement required.

Supervisor Support

List the support to be provided by supervisor (e.g. training, equipment, observation, procedures, coaching):

Four Attachment was sent on 4/6/21 which conforms of: "90 days checklist", "getting started with college teaching", "Glossary of academic and Collin College terminology" and "professionalism in the academic environment."

Referral was made to Cougarweb page, under the faculty tab where compensation link can have detailed job description.

Multiple conversations occurred per dates mentioned above.

Additional sources were sent on 4/28/21 which was the Collin College link to the faculty resources and attached was the "Faculty Handbook" file. Prof. Jonson acknowledged upon receipt.

The Employee Discipline Form as provided above has been reviewed and approved by a member of human resources.

HR Liaison Reviewed and Approved:

Date: 5/5/2021

Changes to template verbiage must be approved by HR.

Supervisor Initials: HA

Employee Initials:

HRC Initials:

Failure to show improvement in your job performance or behavior by stated deadlines and/or any future violations of the same or similar nature will subject you to further disciplinary action, up to and including termination of employment.

Acknowledgement of Receipt of Performance Documentation

Immediate Supervisor: [Signature] Date: 5/5/21
Next Level Supervisor: [Signature] Date: 5.5.21
Employee: [Signature] Date: 5.5.21

Your signature acknowledges discussion of the issues and receipt of the document. It does not indicate agreement with the document. You may add comments in the box below or submit them later by memo or e-mail.

Changes to template verbiage must be approved by HR.

Supervisor Initials: [Signature]
Employee Initials: [Signature]
HRC Initials: [Signature]

EXHIBIT P

Coaching and Discipline Instructions

Employee Coaching Instructions

The coaching notice is used in non-disciplinary circumstances to document conversations with an employee in which the supervisor provides constructive feedback for behavior or performance that has been discussed informally but is still not meeting expectations.

The coaching notice is completed in Workday. Be specific regarding the behavior, results, job responsibilities, impact, time frame, etc when providing constructive feedback. Once created and submitted, the notice will route to your HR consultant for review. Upon approval of the form in Workday, you and the employee will meet for you to deliver the notice. You can either print two copies of the notice for your meeting or use a tablet or computer to display the electronic notice. You and the employee will need to electronically acknowledge the delivery of the notice.

Detailed instructions for completing this process are available in the [Workday Resource Center](#). Note: You must log in to CougarWeb to view this resource.

Employee Discipline Instructions

The discipline notice is used in situations that have either progressed beyond coaching or are serious enough to warrant discipline. Use of this notice requires prior conversation with your HR consultant to verify that disciplinary action and the selected level are appropriate.

After consultation with HR, initiate the discipline notice in Workday. In the Job Responsibilities or Behaviors section, provide specific information about incidents, performance, or behaviors that were inappropriate (including dates), policies or core values violated, results that were deficient in quality or quantity, etc. Describe what improvement or changes are needed for acceptable results.

In the Supervisor Support section, list the types of support you might provide to assist the employee in changing behavior or improving performance. This support may be new software or an improved tool, written procedures, a new form, coaching, a peer mentor, classroom visits, or on-the-job training. You should discuss this with your supervisor and/or your HR consultant to determine the best approach to ensure success.

Once created and submitted, the notice will route to your HR consultant for review. Upon approval of the form in Workday, you will meet with the employee to review the notice. You can either print two copies of the notice for your meeting or use a tablet or computer to display the electronic notice.

While meeting with the employee, establish a date to meet again for a follow-up discussion about progress toward the required changed behavior or improved work results. You may need only one follow-up meeting, or you may need several additional meetings for further feedback, questions, verification of training, etc. You and the employee will acknowledge that the notice has been delivered.

4/25/22, 6:16 PM

Coaching and Discipline Instructions - Collin College

If the employee has not made the required improvement or changes in the designated time frame and after follow-up discussions, consult your supervisor and HR consultant for appropriate next steps.

Detailed instructions for completing this process are available in the [Workday Resource Center](#). Note: You must log in to CougarWeb to view this resource.

Recommendation for Termination

The request for termination is used when terminating employment. Prior conversation with your HR consultant is required to verify that a recommendation for termination is appropriate. This process is completed in Workday.

Detailed instructions for completing this process are available in the [Workday Resource Center](#). Note: You must log in to CougarWeb to view this resource.

EXHIBIT Q

14189

On May 7, 2021, at 5:04 PM, Hatem Aboalam <haboalam@collin.edu> wrote:

Tiffani,

Thank you for meeting with me yesterday, it is imperative that we align your vision with Collin college core values and mission statement. As a new hire we understand that there will be few challenges that you will face, I wanted to assure you that we will be here for you whenever you need help or resources to preform your job, deliver your tasks on time.

My request was for you to send the notes you took in regards of each task we discussed in your own understanding and expression and not the entire 3 hours meeting notes. That way I confirm that you comprehensively understood the program goals assigned to be able to deliver it efficiently and on time.

And I have to confirm as we discussed in the meeting that these goals are not all assigned to you, these are the priority goals for the program at this phase. We will discuss further in our weekly meetings which ones you will need to work on.

Let me help you clarify few things, you stated in your email the following:

Due Today, ASAP:

- ** Send PTCB an attestation form for Collin to be a recognized program.*
- ** Request a faculty tab with the helpdesk.*
- ** Request 3-course shells with the helpdesk.*
- ** Request Access to concur solutions with the helpdesk.*
- ** Send you all the notes from the meeting as I understood the expectations for everything.*

All of these are not tasks to deliver for the program, these are tools that you will help you access resources to better perform your job. Except for the attestation form which you have mentioned in your earlier email that you found out that it was done by me already last year.

As for the two goals that you selected to deliver on 5/12:

1. 1. The castle branch contacts task has an update, since students pay for the immunization, drug screening and background check we do not have to use them anymore. I have a contact for another provider that I will reach out to. So you can scratch that task off.
2. 2. The books names and technology could be provided without reaching to Toby or Darren. Prices are not required as a part of the goal. This goal should take the time needed to write down 3 books names and technology required for student access, as you are familiar with paradigm publisher from your previous experience with them.

That being said, I will assign another task instead of the one was scratched off, please work on the student packet goal, I am also attaching a student packet from the sleep study program to have an idea on what info should be there.

Please reach out for any additional resource, clarification or questions and I will be happy to help.

Have a good weekend,

Hatem Aboalam, RPh
Director, Pharmacy Technician Program
Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Thursday, May 6, 2021 5:02:36 PM
To: Hatem Aboalam <haboalam@collin.edu>
Subject: Follow up notes from 5/6 meeting

Hatem

You asked me to type and email all the notes from our meeting today and send you the goals I'll have completed by our next meeting on 5/12.

As you know, we covered a lot of information; therefore, I will not meet your request for the notes. However, Please the goals below that I will have completed by 5/12.

Due Today, ASAP:

- * Send PTCB an attestation form for Collin to be a recognized program.
- * Request a faculty tab with the helpdesk.
- * Request 3-course shells with the helpdesk.
- * Request Access to concur solutions with the helpdesk.
- * Send you all the notes from the meeting as I understood the expectations for everything.

Due 5/12

- * Reach out to Castle Branch and confirm the Pharmacy template and access (you will send me the contact person's information)
- * Update the books and technology required. (*after I contact toby for the student prices and reach out to Darren to update students bundle packet, then email Hatem book names and prices)

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office#: 972-553-1127
TNJohnson@Collin.edu
Collin College Technical Campus
2550 Bending Branch Way
Allen, TX 75013

EXHIBIT R

Archived: Wednesday, June 4, 2025 5:23:17 PM
From: Christina Canales
Sent: Monday, May 17, 2021 4:27:32 PM
To: Tiffani Johnson
Subject: RE: Additional Accommodations
Importance: Normal
Sensitivity: None

You Are very welcome... Have a good week!

Christina

From: Tiffani Johnson
Sent: Thursday, May 13, 2021 8:30 PM
To: Christina Canales <canales@collin.edu>
Subject: Re: Additional Accommodations

Good evening,

Okay, Thank you.

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu

14189

On May 13, 2021, at 11:16 AM, Christina Canales <canales@collin.edu> wrote:

Hi Tiffani,

The information we have needs to substantiate your request by identify the impairment you are requesting to be accommodated.

To date, we only have the service dog(s) on file so, the short answer, you would need to complete the same online form to submit your request, and so that we have it logged, then you would need to provide the appropriate medical information.

Thanks,

Christina O. Canales, MBA, MS
HR Manager, Benefits
Ph: (972) 599-3164
F: (972) 599-3156

Have a COVID-19 related question? Please email covid-19answers@collin.edu.

"Be still, and the world is bound to turn herself inside out to entertain you. Everywhere you look, joyful noise is clanging to drown out quiet desperation". – Barbara Kingsolver



From: Tiffani Johnson
Sent: Saturday, May 8, 2021 8:59 AM
To: Christina Canales <ccanales@collin.edu>
Subject: Additional Accommodations

Good Morning Christina,

Do I need another accommodation request from my doctor for assistance like additional time to complete projects, daily focus time, or flexibility in my work schedule?

Thank you.
Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TJohnson@Collin.edu

14189

EXHIBIT S

Archived: Thursday, June 5, 2025 1:13:48 PM
From: Tiffani Johnson
Sent: Friday, June 4, 2021 2:10:14 PM
To: Hatem Aboalam
Subject: RE: Next Doctor's Appt.
Importance: Normal
Sensitivity: None

Just making sure I'm covered.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Friday, June 4, 2021 2:08 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Re: Next Doctor's Appt.

Thank you for updating me on the hours.

Just to clarify, If you leave at 3pm today instead of 5, why are you making 4 hours up staying till 7pm for 2 days?

Hatem Aboalam,RPh

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Thursday, June 3, 2021 6:41:17 PM
To: Hatem Aboalam <haboalam@collin.edu>
Subject: RE: Next Doctor's Appt.

Friendly reminder, tomorrow, I will be leaving at 3pm for my 4:30pm doctor's appointment.
I adjusted my schedule on Tuesday and Today to accommodate my hours for tomorrow. I worked:

- * Tuesday 8am to 7 pm
- * Today will leave at 7pm

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tiffani Johnson
Sent: Tuesday, May 11, 2021 5:22 PM
To: Hatem Aboalam <HAboalam@collin.edu>
Subject: RE: Next Doctor's Appt.

Thanks for the feedback.

For the July appointment, I will come after the appointment.

As you know, CII prescriptions have strict regulations, and I have to go every 28 to 30 days to prevent running out of my medication.

Unfortunately, I have a good doctor with many patients and a very business schedule; therefore, I have to get in where I can. Please understand, all of my appointments will be an inconvenience to my work schedule because his office is near my home, which is an hour away.

My doctor only allows appointments to be scheduled every 4 weeks.

Having the second appointment scheduled this far in advance was a special request due to me starting a new job.

I can not guarantee it will be allowed each time I schedule my appointments.

I will do my best to schedule appointments with the least interruption of my workday as possible.

Thanks again.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Monday, May 10, 2021 8:00 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Next Doctor's Appt.

Tiffani,

For June 4th appointment, just adjust your schedule for that week to accommodate leaving early that Friday.

For the July 2nd one, since it is far ahead I would suggest that you can change it to a different time earlier in the morning, that way you can make it to campus for the rest of the day or later in the day like the Friday one. If you are not able to change it then come to campus after you finish the appointment and make it up during the week. There is no sense of spending 4 hours commuting that day.

I recommend you try to schedule all your future appointments early in the morning and that way it will not interfere with your work schedule.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: [Tiffani Johnson](#)
Sent: Monday, May 10, 2021 3:09 PM
To: [Hatem Aboalam](#)
Subject: Next Doctor's Appt.

Hatem,

As request advance notice of my Doctor's appointment. See the following two dates below.

- * June 4, 2021, at 4:30
(I will need to leave at 3:00)

- *** July 2, 2021, at 11:30**

With this appointment, I would be on campus for 2 hours before making this appointment and making it back to campus at about 1:30, with 3.5 hours left to work. I will spend 4 hours this day commuting to and from campus twice, and my Doctor's office is 15 minutes from my house. Would you approve of me working from home either the beginning part of the day, the latter part of the day, or this entire day? If I worked from home this day, I could use my lunch hour for my appointment and only lose 30 minutes commuting. Otherwise, I can request the entire day off. What would you suggest or approve I do for this appointment?

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office#: 972-553-1127
TNJohnson@Collin.edu
Collin College Technical Campus
2550 Bending Branch Way
Allen, TX 75013
Office: A210B



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EXHIBIT T

Archived: Wednesday, June 4, 2025 5:15:45 PM
From: Christy Phoenix
Sent: Wednesday, May 19, 2021 5:18:00 PM
To: Tiffani Johnson
Cc: Hatem Aboalam Andreina Fowler Tara Rice Christina Canales Maxine Walker Michelle Millen
Subject: Fw: LOA - Paperwork/Process - Neubel-Johnson, T
Importance: Normal
Sensitivity: None

Hi Tiffani,

This email was forwarded to me this afternoon. Please confirm with your manager that Leave without pay is approved, this request is based on the business need.

Thanks,
Christy

From: Andreina Fowler <afowler@collin.edu>
Sent: Wednesday, May 19, 2021 5:06 PM
To: Tara Rice <trice@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: FW: LOA - Paperwork/Process - Neubel-Johnson, T

Thanks!

Andreina R. Fowler, SHRM-CP
Human Resources Consultant
Collin College
(972) 599-3161
AFowler@collin.edu



From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Wednesday, May 19, 2021 4:20 PM
To: Tara Rice <trice@collin.edu>
Cc: Hatem Aboalam <haboalam@collin.edu>; Christina Canales <ccanales@collin.edu>; Cherie Hill <chill@collin.edu>; Monica Barron <mbarron@collin.edu>; Sean Buck <tsbuck@collin.edu>; Vinna Cook <vcook@collin.edu>; Andreina Fowler <afowler@collin.edu>
Subject: RE: LOA - Paperwork/Process - Neubel-Johnson, T

Hi Tara,

Thank you for the information; however, I am not interested in using any FMLA or any form of paid time off.

I understand by requesting 5/21 and 5/26 – 5/28 will be time off without pay.

Thank you again.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tara Rice

Sent: Wednesday, May 19, 2021 4:01 PM

To: Tiffani Johnson <tnjohnson@collin.edu>

Cc: Hatem Aboalam <haboalam@collin.edu>; Christina Canales <ccanales@collin.edu>; Cherie Hill <chill@collin.edu>; Monica Barron <mbarron@collin.edu>; Sean Buck <tsbuck@collin.edu>; Vinna Cook <vcCook@collin.edu>; Andreina Fowler <afowler@collin.edu>

Subject: LOA - Paperwork/Process - Neubel-Johnson, T

Hi Tiffani,

I understand that you will absent from work on an intermittent basis due to your own serious health condition beginning on Friday, May 21, 2021. This email contains Leave of Absence information. I encourage you to contact us if we can assist you in any way.

The following items are the steps for requesting leave and submitting the appropriate documentation:

1. Request for Leave of Absence Form
 - * Please click the above link to request your leave of absence electronically.
2. Non-FML Certification Packet (document attached)
 - * Send the Certification Packet along with your attached Job Description to your physician's office.
 - * Your physician completes and returns the Certification, this allows us to gather medical information related to your absence(s).
3. Fitness for Duty/Return to Work Form
 - * Send the form to your physician's office *prior to your return to work*.
 - * Medical authorization is necessary when you return to work following a medical absence to assist in determining if any applicable leave needs to be intermittent or continuous.

Your doctor's office may fax your completed forms to me at 972-599-3156, or scan them in through email to benefits@collin.edu.

Family & Medical Leave Act / Leave of Absence Information

You can find information regarding Family & Medical Leave Act and Leave of Absence policies and procedures by clicking this [FMLA/Leave of Absence Guidelines](#) link.

- As indicated in the attached *Notice of Eligibility and Rights and Responsibilities* form, you are NOT eligible for leave under the Family and Medical Leave Act (FMLA).
Our system shows your adjusted service date as March 22, 2021. In order for an employee to be eligible for FMLA, they must have worked for the employer at least 12 months and have at least 1,250 hours of service for the employer during the 12 month period immediately preceding the leave.
- However, employees who have a serious health condition but do not qualify for leave under FMLA may use all their available paid leave and up to 160 hours (20 days) of leave without pay (LWOP).
- Please remember that until your Non-FMLA Certification of Health Care Provider is received, your leave of absence is not approved.

Leave Availability / Absence Reporting

Pursuant to Collin College's Board Policy DEC (Local), the College District requires employees to use FMLA leave concurrently with all applicable paid leave. Therefore, even if you have sufficient paid leave available to cover your time off from work, you must still submit the necessary documentation.

- * You will continue to earn 8 hours of sick pay on the last day of each month that you are in a paid status.
- * Should available leave be exhausted and you enter a Leave Without Pay (LWOP) status, this will affect your ongoing accruals. Upon entering a LWOP status, you will be responsible for any benefit premiums that become due.

Below are your current available leave balances:

<u>FMLA / Faculty/F6</u>	<u>Paid leave as of:</u>	<u>5/19/21</u>
Vacation remaining		0.000
Unearned Vacation*		N/A
Earned Vacation^ (use elig. f/FMLA)		0.000
Personal		0.000
Sick Pay		8.000
Comp		0.000
<u>Paid Leave Hours Available =</u>		8.000
*Current monthly vacation hours accrual =		<u>8.00</u>
^Only earned vacation can be used while on FMLA.		

Prior to taking leave time:

- You will need to ensure your time off work is coded properly as "**900 - MISC**" in TimeClock Plus.
 - * If you need to miss work unexpectedly and return within the designated timeclock week, you should enter your time upon your return.
 - * In the event that you are unable to enter your time within the designated timeclock week, your supervisor will enter this information on your behalf.
 - * In this case, Human Resources Benefits team will allocate your paid time-off based on your available and eligible leave balances.

You are enrolled in both short and long-term disability. Should you feel you will be out on leave for at least thirty (30) days, please feel free to reach out to the Reed Group and begin a claim. You can find more information on the claim process [here](#).

Please don't hesitate to contact me if you have any questions or concerns.

Best Regards,

Tara Rice, PHR
Benefits Generalist
p. 972.758.3849
f. 972.599-3156
Benefits Team

EXHIBIT U

Archived: Thursday, June 5, 2025 11:51:20 AM
From: Hatem Aboalam
Sent: Monday, August 2, 2021 9:25:32 AM
To: Tiffani Johnson
Subject: RE: Call-in For Today
Importance: Normal
Sensitivity: None

Good morning,

Thank you for letting me know Tiffani, I hope all is well with you.
That is fine. You can report your absence in TCP when you return to campus tomorrow.

Have a good day,

Hatem

From: Tiffani Johnson
Sent: Monday, August 2, 2021 6:28 AM
To: Hatem Aboalam <haboalam@collin.edu>
Subject: Call-in For Today
Importance: High

Good morning,

Unfortunately, I will not be in today due to a critical personal situation.
I'm expecting to return tomorrow; until then, I will be unavailable.

Thank you in advance for your understanding.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

Pharmacy Technician Professor

Office#: 972-553-1127

TNJohnson@Collin.edu

Collin College Technical Campus

2550 Bending Branch Way

Allen, TX 75013

Office: A210B

EXHIBIT V

Archived: Thursday, June 5, 2025 11:57:58 AM
From: Hatem Aboalam
Sent: Tuesday, September 14, 2021 6:02:20 PM
To: Tiffani Johnson
Subject: Re: Doctor's Appointments
Importance: Normal
Sensitivity: None

You are welcome.
Should be back to F2F on Thursday for classes?

Hatem Aboalam, RPh

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Tuesday, September 14, 2021 5:59 PM
To: Hatem Aboalam
Subject: RE: Doctor's Appointments

Great. Thanks. I mentioned it but told them once I get the approval, I'd confirm with the zoom link and info.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Tuesday, September 14, 2021 5:53 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Re: Doctor's Appointments

That is alright with me. Did you already notify the students for both sections of the change?

Hatem Aboalam, RPh

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Tuesday, September 14, 2021 5:31 PM
To: Hatem Aboalam
Subject: RE: Doctor's Appointments

Yes.

1st class - 8am
2nd class – (11am – 11:55)
3rd class - 1pm.

If I come to campus, I'll have to leave halfway through my 2nd class to make the appointment on time. Which will have the students coming to campus for only 30 mins oppose to their normal 2 hours.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Tuesday, September 14, 2021 4:55 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Doctor's Appointments

Tiffani,

I want to confirm that I understand, are you converting classes tomorrow all day into Zoom then?

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013

Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson
Sent: Tuesday, September 14, 2021 3:48 PM
To: Hatem Aboalam
Subject: Doctor's Appointments
Importance: High

Hi Hatem,

My doctor has to leave the country for an urgent matter and moving his patients' appointments up.
My appointments have been changed to tomorrow at 12:30 pm and Friday, Sept. 17th all day.
I teach via Zoom tomorrow until noon and work the rest of the day from home or take off the rest.
Friday, I will put in a time request.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office#: 972-553-1127
TNJohnson@Collin.edu
Collin College Technical Campus
2550 Bending Branch Way
Allen, TX 75013
Office: A210B



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EXHIBIT W

Archived: Thursday, June 5, 2025 11:58:18 AM
From: [Hatem Aboalam](#)
Sent: Saturday, October 2, 2021 6:21:22 AM
To: [Tiffani Johnson](#)
Cc: [Michelle Millen](#)
Subject: Re: Doctor Appointment Dates
Importance: Normal
Sensitivity: None

Sounds good; I can approve Monday once you request it in the system. Share 10/13 plan upon updates.

Thank you, and have a good weekend.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
[2550 Bending Branch Way](#)
[Allen, TX 75013](#)
Office #: [9725496393](#)
Haboalam@collin.edu

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Friday, October 1, 2021 4:22:31 PM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Doctor Appointment Dates

Monday, I will be here for classes. October 13th, I haven't thought that far ahead because Gen Pop has finals that week, and I'm on a call list to have my appointment moved back in case someone cancels their appointment.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Friday, October 1, 2021 10:34 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Doctor Appointment Dates

Good morning Tiffani,

Thank you for letting me know about your appointments, I hope you are better soon.
What are you going to do with the classes on the days of the medical appointment?

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson
Sent: Friday, October 1, 2021 9:44 AM
To: Hatem Aboalam
Subject: Doctor Appointment Dates

Good morning Hatem,

Please see the upcoming dates for Medical appointments. Relative to my yesterday's emergency, I have one this coming Monday.

Monday, October 4, 2021 @ 2:15 pm
Wednesday, October 13, 2021 @ 9:30 pm

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office#: 972-553-1127
TNJohnson@Collin.edu
Collin College Technical Campus
2550 Bending Branch Way
Allen, TX 75013

Office: A210B



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EXHIBIT X

Archived: Tuesday, June 3, 2025 11:56:39 AM
From: [Hatem Aboalam](#)
Sent: Thursday, November 18, 2021 6:23:20 PM
To: [Tiffani Neubel-Johnson](#)
Cc: [Michelle Millen](#)
Subject: Re: Out sick
Importance: Normal
Sensitivity: None

Ok thank you for letting us know.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Neubel-Johnson <tneubel26@gmail.com>
Sent: Thursday, November 18, 2021 5:29:09 PM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Re: Out sick

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

Good evening,

I will be out until Monday, this new doctor only send CII prescriptions in on Fridays. She gave me a return to work note for Monday.

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

On Nov 18, 2021, at 12:43 PM, Hatem Aboalam <haboalam@collin.edu> wrote:

Ok!

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Neubel-Johnson <tneubel26@gmail.com>
Sent: Thursday, November 18, 2021 6:25 AM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Out sick

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

Good morning,

I apologize for the untimely notice, but I will not be able to work today. I'm still without my prescription and my body is experiencing the side effects of withdrawal. I hope to have my medication by the end of today and return tomorrow.

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

EXHIBIT Y

Archived: Thursday, June 5, 2025 11:50:31 AM
From: Hatem Aboalam
Sent: Monday, May 10, 2021 7:23:06 PM
To: Tiffani Johnson
Subject: RE: Program Packet
Importance: Normal
Sensitivity: None

Tiffani,

I am well aware of what I sent you. Please compare the packet from the sleep study program and use it to complete the Pharmacy Technician student packet. I understand you did not choose it however, I assigned it to you.

You stated before in our meeting on 5/6 that you did not know what a student packet was, how is it that you know what the accreditation requires on it or if it has any requirement?

You can start from scratch or use my head start, whatever suits you better.

I will extend the time on time to be delivered on Friday before 5 pm along with the technology required. Failure to deliver both on time will delay our program progress as we have plenty of other things to work on.

Let me know if you have questions.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson
Sent: Monday, May 10, 2021 5:26 PM
To: Hatem Aboalam
Subject: RE: Program Packet
Importance: High

Sir,

This head start you gave me is the first three sections of the website information I gave you. Did you want me to use this information to begin building the packet? I can make a packet as I see fit and per the ASHP guidelines, but I'd rather save time by doing it your way the first time.

Would you mind providing me with the five topics you said were summarized from the website information admission process? I didn't see that information on the website, and those are the topics you wanted to include in the packet, correct? Please note, I didn't choose the packet as a goal I could complete by 5/12 because I knew it would need more time.

However, If you want me to have a portion or draft of the packet put together for the meeting, please send me the five points you mentioned in the 5/6 meeting.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Monday, May 10, 2021 9:35 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Program Packet

Good morning Tiffani,

Figured to give a head start on the packet, hope this helps.

Let me know if you have questions. The packet is expected on 5/12 meeting at 1 pm instead of 11 am to accommodate Dean Millen schedule as she will be joining us.

I will send an invite soon.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

EXHIBIT Z

Archived: Thursday, June 5, 2025 9:31:26 AM
From: Tiffani Johnson
Sent: Wednesday, June 9, 2021 6:40:52 PM
To: Hatem Aboalam
Cc: Michelle Millen
Subject: RE: Comments on task "Student hand book"
Importance: Normal
Sensitivity: None

Hatem,

Please see my answer to your questions below.

What are the things that your plate is packed with?

- * I am working with two software companies to learn their product and if we have the technology to run their software. All to determine if it will be the right fit for your program
- * I am trying to get through the faculty starting line to understand and learn the functions and requirements involved with teaching and Collin.
- * I am searching my network for recruitment opportunities.
- * Making consistent revisions to the student packet and application. Which have been weekly since April 26th.

Each of those has many moving parts to them, which takes a lot of my time.

You were not able to build courses into Canvas since you do not have a shell yet per your request yesterday in your email. What other duties are you referring to? I have been building my courses in one sandbox, setting up each class as a module. There are things I cannot access unless I have an actual course shell. The other duties entail learning the Cengage book you want to use for pharmacy law and find a new POS software for the program.

The student packet you delivered, I am reviewing it. What do you mean by "indecisiveness"?

- * I'm not sure which packet you are reviewing because you asked for corrections that said would be delivered EOB today. What I meant by indecisiveness, you've had me make changes to the packet, then asked for some of those things to be taken off.
- * On June 6th, via email you requested additional changes to the packet. You attached a copy to the email, you uploaded a copy to Teams, and I had the last edited copy. All three documents were different. I wrote on the printed copy I had during our meeting, which reflected your most recent changes. The two copies you provide me were different versions with old edits and comments. In that same email you wanted the application packet to match the application you emailed to me on June 3rd. That application in your email was an old version that had 12 items listed under the pre-acceptance checklist, which are now 5.

What deliverables are you needing, and for what tasks?

- * To complete the advisory board voting form, you were going to email me the strategic plan, admissions and dismissal criteria. Have yet to receive that email.
- * I ask you several times since 5/7 to be assigned to my courses, because Josh would sit with me and show me how to calculate my faculty load. You are just responding to that request on 6/9.
- * May 25th I sent you a Pioneer demo webinar for May 26th when I would be out. June 8th, I sent you another email stating Pioneer isn't a free software anymore and asked how would you like to proceed. You haven't responded.

What tasks are you referring to when you say "adequate time"?

- * You often will email me task EOB or after 5 pm and request, I have it complete by the next day. Unfortunately, the task you give can't be quickly done.
- * You give me early and short windows on a project that aren't necessary until weeks later, when there are other pressing things to do.
- * You send me multiple emails that require a detailed response, and when I do not reply the same day, you say I don't respond to emails.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Wednesday, June 9, 2021 2:17 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Comments on task "Student hand book"

Tiffani,

Unfortunately I will have to disagree with what you stated. Please help me clarify,

What are the things that your plate is packed with? You were not able to build courses into canvas since you do not have a shell yet per your request yesterday in your email. What other duties you are referring to?
The student packet you delivered, I am reviewing it. What do you mean by "indecisiveness"?
What deliverables you are needing, and for what tasks?
What tasks are you referring to when you say "adequate time"?

Hatem

From: Tiffani Johnson
Sent: Wednesday, June 9, 2021 12:33 PM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Comments on task "Student hand book"
Importance: High

Hatem,

My plate has been packed with many things given to me and building my courses and other duties.
I have been working as fast as I can in light of the indecisiveness with the student packet.
I have also been waiting on deliverable from you to complete specific tasks.

You have not been giving me the adequate time and necessities to meet your expectations.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Wednesday, June 9, 2021 11:41 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Comments on task "Student hand book"

Thank you for bringing that up to my attention. The student handbook is a part of the ongoing program goals.

That is the main reason I needed your assistance revising this document. I am aware that there is a possibility of mistakes being there, It was initiated as a draft before I started teaching past August and I did use Vernon College handbook as a guide in some areas, Katrina who is the program coordinator was a good source of info.

This document was sent to you on 4/8 as a resource and it was reassigned to you on 5/27 as a task. Knowing the deadline ahead, am not sure why would you state all that on the day of the task supposed to be delivered. That does not show a good communication from your end about tasks assigned to you.

This task will be marked as not delivered on time since you are not able to deliver today based on the due date given.

We will follow up on this task delivery on our next meeting on Monday 6/14.

Please let me know if you have questions.

Thank you,

Hatem

From: Tiffani Johnson
Sent: Wednesday, June 9, 2021 11:13 AM
To: Hatem Aboalam <haboalam@collin.edu>; Pharmacy Tech Program <PharmacyTechProgram@CollinCollege620.onmicrosoft.com>

Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Comments on task "Student hand book"
Importance: High

Hatem,

I have not read the entire handbook due to ongoing program goals, teaching requirements, and training. I recently skimmed through the handbook and realized I

would need time to carefully read through the packet for essential changes. To name a few, here is what I saw:

- * The statements below have another college name.
 - * "2. I hereby release and agree to hold harmless **Vernon College**..."
 - * "By signing, you give **Vernon College** permission to have the Texas Department of Public Safety Crime Records Service conduct the search, and report all findings to **Vernon College**."
- * Sections that ask for the student's social security number, which we agreed not to collect.
- * The state board of pharmacy trainee fee is wrong
- * The requirements under this statement aren't accurate "To achieve PTCB Certification, candidates must satisfy the following eligibility requirements."
- * The two certifying bodies are listed, but the requirements must be separated according to the entity.

With all mentioned above, I apologize that I will not meet today's deadline.

I don't know when it will be completed because there will be multiple reviews before final approval.

How would you like to proceed?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Wednesday, June 9, 2021 10:22 AM
To: Tiffani Johnson <tnjohnson@collin.edu>; Pharmacy Tech Program <PharmacyTechProgram@CollinCollege620.onmicrosoft.com>
Subject: RE: Comments on task "Student hand book"

the packet is only a small part of the handbook, you can deliver the rest of it. the due date remains the same for today.

These comments are about the task Student hand book in the plan Program Goals and Task.

Reply in Microsoft Planner or reply to this email to add a task comment.

From: Tiffani Johnson <tnjohnson@collin.edu>

Sent: Tuesday, June 8, 2021 7:55:09 PM

To: Pharmacy Tech Program <PharmacyTechProgram@CollinCollege620.onmicrosoft.com>

Subject: Comments on task "Student hand book"

Can we remove the due date for this task seeing that we been spending a lot of time on the Packet?

Reply in Microsoft Planner

You can also reply to this email to add a task comment.

This task is in the Program Goals and Task plan.

EXHIBIT AA

Archived: Thursday, June 5, 2025 9:31:40 AM

From: Tiffani Johnson

Sent: Wednesday, June 9, 2021 8:06:48 PM

To: Hatem Aboalam

Cc: Michelle Millen

Subject: Re: Tasks Deadlines

Importance: Normal

Sensitivity: None

Hatem,

Would like me to resign? It seems everything I do isn't meeting your expectations and you see me as a hinderance to your program.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

Pharmacy Technician Professor

Office #: 972-553-1127

TNJohnson@Collin.edu

14189



On Jun 9, 2021, at 4:48 PM, Hatem Aboalam <haboalam@collin.edu> wrote:

Hello Tiffani,

I needed to emphasize on the importance of sticking to deadlines, deliverables and communication on what needed to deliver tasks, so far we have not been moving forward with the program in an acceptable pace. the explanation you provide on why the tasks are not delivered on time does not cancel our the fact that the tasks are not delivered and the deadline are not met.

The purpose of our weekly meetings was to improve our communication, establish a strong collaboration method between us and aim that towards the program progression. This has not been the case with the lack of communication about resources needed for tasks, for example:

- * On 4/6/21 and 4/8/21, you were given the resources to start faculty start line training, which will lead you to be familiar on Canvas, which was communicated to you is the platform needed to build our courses at Collin College. After 4 weeks you stated in our meeting on 5/6 that you could not log into Canvas. After our meeting I demonstrated on how to login where it was discovered that you could indeed access the course independently. That was 4 weeks wasted with zero communication from your side on that.
- * On 6/9, you needed to deliver the student handbook, the task was reassigned to you on 5/27, no communications were made about this task until today when I asked about it. Stating that it was full of mistakes and you need more time to finish it. The task was to revise it so we can catch mistakes and inspect accreditation requirements. This is a concerning example of a deadline not being met on time due to lack of communication from your side.
- * When I asked for your agenda this morning as I stated that I may need assistance working on some tasks, you stated that you have a professional development webinar that was not on your calendar from 12-3 pm, and until now I did not get an answer if it is Collin related or not. Even though I sent 2 emails asking for that. Your reply only showed that is about financial help for students, which is not related to you as a faculty since budgeting is a program director related job. So the fact that you would spend 3 hours on a Wednesday afternoon to attend unrelated webinar to your job description while your supervisor is reaching out for assistance is negatively impacting our collaboration.

Based on these examples mentioned above, please be mindful of the action plan that we had on your level 1 disciplinary action on 5/5/21, it stated "*Professor Johnson is expected to perform job duties efficiently and effectively on a consistent and ongoing basis. Professor Johnson will need to provide details on deliverables and results to each of her action items during weekly meetings and email updates. Professor Johnson must comply with all directives and/or responsibilities that has been assigned to her by Dir. Aboalam*"

Moving forward, your participation in any external involvement is expected to support the Pharmacy Technician program and directly support your role in Collin College. Any additional responsibilities to these listed ones should be approved by the program director prior to acceptance. Professional Development Activity contribute to classroom excellence and/or district goals should be initially discussed with the program director. And the hours spent on that professional development must be made up and can not count as a part of office hours.

All tasks are to be delivered via email and not uploaded on teams, you may upload it later on your own time but sending it directly to me is the only acceptable way to know you have completed the task.

Thank you,

EXHIBIT BB

Archived: Thursday, June 5, 2025 9:31:47 AM
From: Tiffani Johnson
Sent: Thursday, June 10, 2021 11:16:19 AM
To: Michelle Millen Christy Phoenix
Subject: RE: Please help me
Importance: Normal
Sensitivity: None

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Michelle Millen
Sent: Thursday, June 10, 2021 10:29 AM
To: Tiffani Johnson <tnjohnson@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: Re: Please help me

Tiffani,
I am taking a vacation day today and will be back in the office tomorrow. I read the emails sent yesterday and it seems there is frustration on both sides. Our weekly meetings don't appear to be getting at the root of the issues. Probably the best course of action will be to sit down and try and come to a shared understanding and outline a path forward. I will target early next week for a meeting.
Thank you for reaching out and sharing your concerns.

Michelle Millen, MSCPM, RHIA
Dean Academic Affairs
Health Sciences & Emergency Services
Collin College-McKinney Campus, H201
972.548.6677

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Thursday, June 10, 2021 7:29:36 AM
To: Michelle Millen <mmillen@collin.edu>; Christy Phoenix <cphoenix@collin.edu>
Subject: Please help me

Good morning Dr. Millen,

Since our meeting, I have done and continue to work on everything you suggested.

Hatem had no idea the amount time and work that it takes to build a program. Every project I've completed since I started he has not contributed to any of it.

The documents I've received from him have been copied verbatim from other colleges including my previous program.

Hatem continuously twist situations and verbiage to paint me as if I hindering the program and a poor employee.

I have risked my own safety by staying on campus when everyone is leaving due severe weather or tormao warnings because I'm afraid Hatem will call at 4:59 pm and I don't answer he will claim I'm not available.

Before the disciplinary action I tried to expressing the help and resources I needed from him. As a result the disciplinary action and email followed has been to tear me down. He pretends to be supportive or helpful. Over the past two weeks I have been asking for things from Hatem to complete certain projects but in turn I start getting all these emails accusing me of not doing my job.

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu

EXHIBIT CC



Lisa R. Collier,
CPA, CFE, CIDA,
First Assistant State Auditor

June 15, 2021

Dr. H. Neil Matkin, District President
Collin County Community College
3452 Spur 399
McKinney, TX 75069

Re: Hotline Complaint: 21-5505

Dear Dr. Matkin:

The State Auditor's Office Investigations and Audit Support receives information from the citizens of Texas through our reporting system (telephone hotline, Web site, and correspondence). Through that reporting system, citizens provide information regarding suspected fraud, waste, abuse, and/or inefficient operations at state agencies or higher education institutions.

Enclosed is a copy of a complaint that we received regarding allegations of improprieties at Collin County Community College. We have reviewed the information and determined that it should be referred to you for further review and/or possible action.

If you have any questions or would like to discuss this matter, please contact me at (512) 936-9500.

Sincerely,

Ileana Barboza

Ileana Barboza, CGAP
Managing Senior Auditor

Enclosure

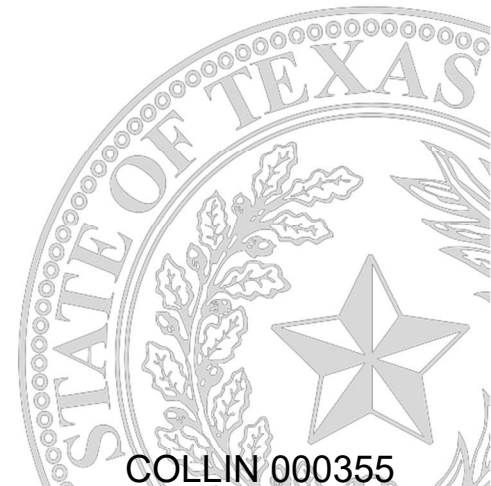
CC: Mr. Ali Subhani, CIA, CISA, GSNA, Director
of Internal Audit

Robert E. Johnson Building
1501 N. Congress Avenue
Austin, Texas 78701

P.O. Box 12067
Austin, Texas 78711-2067

Phone:
(512)936-9500

Fax:
(512)936-9400



The following fraud, waste, or abuse report was received

Control Number: 21-5505

Name: Tiffani Neubel-Johnson

Phone: 7732161788

Email: tneubel26@gmail.com

Agency/University: 949 - Collin County Community College

Organization/Company/Individual:

Dr. Hatem Aboalam, Pharmacy technician Program Director, Collin College Allen Campus, Has plagiarized materials from other colleges to present them as his work. When brought to his attention, he misused his position of authority by manipulating facts and distorting the truth to file a complaint on his subordinate Tiffani Neubel-Johnson, Professor, which resulted in disciplinary action for her. Mrs. Johnson sent emails to Dr. Aboalam suggesting and request meetings, information, and resources. In the disciplinary form, Dr. Aboalam used the vocabulary from those emails to fabricate and misrepresent the actions and work performance of Mrs. Johnson.

After Dr. Aboalam presented Mrs. Johnson with the Disciplinary form, he harassed and intimidated Mr. Johnson with emails, policies, micro-managing, and non-verbal communication. He set unreasonable inspections and deadlines and delayed providing necessities and resources for Mrs. Johnson to perform her job duties adequately.

Dr. Aboalam's actions have created a hostile work environment, causing Mrs. Johnson to fear Dr. Aboalam. Hatem has gone above and beyond to accuse me of not being available or not working my required office hours, 8am – 5 pm. As a result, Mrs. Johnson is afraid of going to the restroom, stepping out to warm her food, or leaving her office any matter. She has risked safety by staying on campus when everyone is leaving due to severe weather or tornado warnings. She is afraid that Dr. Aboalam will call her office at 4:59 pm, and there is no answer, he will accuse her of not be available or not work her required hours.

Mrs. Johnson has reached out to Dr. Aboalam's supervisor and filed a formal complaint. However, due to the defamation, libel, and slander from Dr. Aboalam, she is confident that his supervisor or the college will believe her complaint nor provide a proper resolution. There are text messages, emails, and documents proving Dr. Aboalam's misconduct has been unprofessional and unlawful.

EXHIBIT DD

Archived: Thursday, June 5, 2025 1:13:55 PM
From: Tiffani Johnson
Sent: Monday, June 7, 2021 5:35:39 PM
To: Hatem Aboalam
Subject: RE: Office Window
Importance: Normal
Sensitivity: None

Will do.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Monday, June 7, 2021 4:45 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Office Window

Hey Tiffani,

I had a conversation with dean Millen regarding covering up the window portion of your office. As a safety issue there a concern to have that part fully covered.

That being said, please have that window area uncovered by the end of today.

Thank you,

Hatem Aboalam, Rph
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F

EXHIBIT EE

EMPLOYEE DISCIPLINE FORM

Employee Information			
Employee Name:	Tiffani N. Neubel-Johnson	CWID:	100588255
Job Title:	Faculty Staff	Department:	Pharmacy Technician
Full-time or Part-time:	Full-time	Exempt / Non-Exempt:	Exempt
Immediate Supervisor:	Hatem Aboalam	Date:	6/14/2021
Performance Status			
<input type="checkbox"/> Level 1 Warning	<input checked="" type="checkbox"/> Level 2 Warning	<input type="checkbox"/> Recommendation for Suspension	
Details			

List the employee's primary job responsibilities or behaviors that require attention and describe the specific improvement that is needed. (Include facts about events, dates, people, documents, etc.)

Job Performance/Behavior Deficiency:

On Thursday, June 10, 2021, Tiffani Johnson was at the Divisional Office mailboxes near Diane Eure, Admin Assistant Desk. Which, Diane shared with Tiffani that she has not had a chance to make a name tag for her. Diane stated Tiffani says something inaudible because she is walking away. Diane ask, "What?" Tiffani comes up to Diane's desk to tell her she probably won't work here much longer. Diane's respond with an "OH, Ok?" Tiffani then takes it upon herself to say that Hatem is a liar; he makes up lies about her, telling she received disciplinary action and how it was all a lie. Then tells Diane she gets to work before he does and leaves after he does, so how could he know when she's working. Tiffani tells Diane, Hatem has taken credit for some of her work, and there are emails to prove it. Tiffani then tells Diane she would have quit about a month ago, this is not what she signed up for, but her husband told her not to quit. If they fire her, they (her and her husband) could sue for wrongful termination. Tiffani also shared that she has worked so hard for this department and tells me everything she has done and more. Tiffani comes closer to Diane's desk, asks her "to picture a slave, and imagines a slave being beaten by her master every day for not working hard enough."

HR received a direct statement from the employee, Diane Eure with the above details.

Specific Results Required for Acceptable Improvement:

Professor Neubel-Johnson behavior on June 10, 2021 was unprofessional and lacked respect for the individual. Professor Neubel-Johnson behavior is not acceptable and does not represent Collin College Core Values of dignity, respect and integrity.

Professor Neubel-Johnson is advised that if this behavior continues it will result further disciplinary actions, up to and including termination of employment.

Date for Improvement to be completed:

Immediately

Changes to template verbiage must be approved by HR.

Supervisor Initials: HA
 Employee Initials: [Signature]
 HRC Initials: [Signature]

Supervisor Support

List the support to be provided by supervisor (e.g. training, equipment, observation, procedures, coaching):

The Employee Discipline Form as provided above has been reviewed and approved by a member of human resources.

HR Liaison Reviewed and Approved: [Signature] Date: 6/14/2021

Failure to show improvement in your job performance or behavior by stated deadlines and/or any future violations of the same or similar nature will subject you to further disciplinary action, up to and including termination of employment.

Acknowledgement of Receipt of Performance Documentation

Immediate Supervisor: [Signature] Date: 06/17/21

Next Level Supervisor: Michelle Miller Date: 6.17.2021

Employee: [Signature] Date: 6/14/21

Your signature acknowledges discussion of the issues and receipt of the document. It does not indicate agreement with the document. You may add comments in the box below or submit them later by memo or e-mail.

Employee Comments

Changes to template verbiage must be approved by HR.

Supervisor Initials: HA
Employee Initials: [Signature]
HRC Initials: [Signature]

EXHIBIT FF

Archived: Wednesday, June 4, 2025 5:38:52 PM
From: Tiffani Johnson
Sent: Tuesday, July 13, 2021 12:36:37 PM
To: Tonya Jacobson
Subject: RE: Receipt of Complaint
Importance: Normal
Sensitivity: None

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tonya Jacobson
Sent: Tuesday, July 13, 2021 11:46 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Receipt of Complaint

Thank you. Now that we have the complaint, we will begin the grievance process. A resolution review panel (RRP) will be appointed to hear and investigate your complaint. I will be in touch with you regarding scheduling your complaint hearing with the RRP.

Thank you,

Tonya Jacobson
Manager, HR/Employee Relations
Collin College
P: (972) 758-3856
F: (972) 985-3778
Tjacobson@collin.edu



From: Tiffani Johnson
Sent: Tuesday, July 13, 2021 11:29 AM
To: Tonya Jacobson <tjacobson@collin.edu>
Subject: RE: Receipt of Complaint

I was afraid something like this would happen, so I printed the screen before I clicked submit. I used the link you emailed to me on 5/6. The complaint details were too long, so I typed the rest in a word document to be submitted with the supporting documents. I submitted a total of 46 pages in part 5 for supporting documents.

Please the attachments.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tonya Jacobson
Sent: Tuesday, July 13, 2021 11:13 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Receipt of Complaint

Ms. Johnson,

How, or to whom, did you file the complaint? We have not received a formal complaint through the Collin College complaint system.

Thank you,

Tonya Jacobson
Manager, HR/Employee Relations

Collin College
P: (972)758-3856
F: (972) 985-3778
Tjacobson@collin.edu

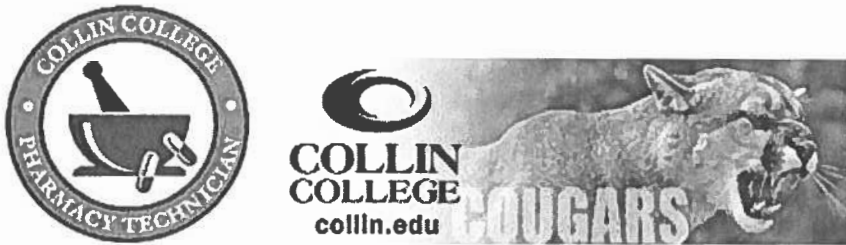


From: Tiffani Johnson
Sent: Tuesday, July 13, 2021 11:03 AM
To: Tonya Jacobson <tjacobson@collin.edu>
Subject: RE: Receipt of Complaint
Importance: High

Good morning Ms. Jacobson,

Unfortunately, I did file a formal complaint on June 10th. However, I never received a response from HR or a hearing officer.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



CONFIDENTIALITY NOTICE: Because e-mail is not a secure medium, confidentiality of e-mail messages cannot be guaranteed. This email message, including all attachments, is for the sole use of the intended recipient(s) and may contain confidential student and/or employee information. Unauthorized use and/or disclosure is prohibited under the federal Family Education Rights & Privacy Act (20 U.S.C. §1232g, 34 CFR Part 99, 19 TAC 247.2, Texas Government Code 552.023. If you are not the intended recipient, you may not use, disclose, copy or disseminate this information. Please call the sender immediately or reply by email and destroy all copies of the original message, including attachments.

From: Tonya Jacobson
Sent: Tuesday, July 13, 2021 10:36 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: Receipt of Complaint

Hi Tiffani,

We have been made aware of the complaint you filed with the State Auditor's Office against Hatem Aboalam. Following their review, the State Auditor's Office determined the complaint should be referred to the College for further review and/or possible action. Should you wish to proceed with this complaint, please file it formally in the Collin College complaint

system, and it will be addressed following Collin's complaint process. Below is the link to the complaint procedures and complaint form. You may also refer to Board Policy DGBA(Local) for additional information regarding the complaint process.

http://www.collin.edu/hr/complaints/Employee_Complaints.html

Regards,

Tonya Jacobson
Manager, HR/Employee Relations
Collin College
P: (972)758-3856
F: (972) 985-3778
Tjacobson@collin.edu



EXHIBIT GG

From: donotreply@collin.edu
To: Monica Velazquez ; Ricky Jackson ; Kim Davison ; Tanya Jackson ; Shelley Shelton ; Neil Blalock
Subject: New Employee Complaint - Tiffani Neubel-Johnson
Date: Tuesday, July 13, 2021 12:14:00 PM

WARNING: The sender of this email could not be validated.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

NOTICE OF NEW EMPLOYEE COMPLAINT

Case Number : 204

COMPLAINANT INFORMATION:

CWID : 100588255
First Name : Tiffani
Last Name : Neubel-Johnson
Job Title : Professor
Campus : Collin College Tech Center
Veteran : No

Address : 2550 Bending Branch Way
City : Allen
State : TX
Zipcode : 75013

Phone Number : 773-216-1788

College Email Address : tnjohnson@collin.edu

TYPE OF COMPLAINT FILED:

Wages Hours Conditions of Work :
Violations of College Policy : Y
Unlawful Discrimination or Harassment : Y
Unlawful Retaliation : Y
Whistle Blower :
At-Will Termination :
Contract Termination :
Any Other Complaint : Y

DETAILS OF COMPLAINT:

Respondent : Hatem Aboalam
Date of Action : April 22, 2021, May 5, 2021, June 9, 2021
Details of Complaint : I received a disciplinary action form from my supervisor on May 5, 2021, based on false accusations. In addition, he copied and used many of my words to him to use against me. I have text messages and emails to prove the lies he put in the disciplinary action. That action plan was an act of retaliation. A direct result of me expressed the help and resources I needed to do my job and him unavailable. As a result, the disciplinary action and email followed have misrepresented me as an insubordinate employee. Over the past two weeks, I have been asking for things from Hatem to complete specific projects. However, in turn, I start getting all these emails accusing me of not doing my job. I have reached out to his supervisor Dr. Michelle Millen explaining the situation. But in emails, Hatem continuously twists conditions and verbiage to

support his malicious actions. He pretends to be supportive or helpful; in reality, he avoids me in the office department area, only communicates via email or on a video meeting with Dr. Millen. Hatem has tried to build this Pharmacy technician program off the work of other colleges, including my previous employer. I have emails from when I sent them my work and recently reviewed from he has presented as his own but has Vernon college name in multiple areas. Hatem claimed to have used them as a reference; however, the information was copied verbatim. Every project I've completed for his program has been all my work that he has not contributed, has presented it as his own. I have an email proving he claimed my work as his own.

Hatem has gone above and beyond to accuse me of not being available or not working my required hours. As a result, since May 5th, I've afraid of going to the restroom, stepping out to warm my food, or leaving my office for any matter, know he will use it against me. On June 3rd, Hatem saw me at the copy machine right outside my office; he did not speak or acknowledge me. While I was still at the copy machine scanning documents, he returned to his office and called my office; I missed he called. That same day he sent an email that began with, "Hello Tiffani, I tried calling your office, but there was no answer however, ". There have been many instances, I have risked my safety by staying on campus when everyone is leaving due to severe weather or tornado warnings. I'm afraid Hatem will call at 4:59 pm, and I don't answer, he will claim I'm not available or not work my required hours. I am the only financial support for my family can not afford to lose my job by any means, so I stayed. Several times, Jane Lopes has said to me, "Come on, everyone is leaving; the weather will get worse." One of those days, she stayed at my door until I shut down my computer and packed up to leave.

I can't fit everything in this box, I have attached a separate document with the remaining details.

Witnesses : Michelle Kelly

Leon Deutsch

Josh Snyder

Diana Eure

Christy Phoenix

Officer Powell

Witness Information : Michelle Kelly- On the day of 4/6, I showed Michelle Kelly the picture I took in the classroom. Mrs. Kelly can attest to me always being there before she gets to campus and there when she leaves. witness Hatem not being available to assist me, witness to him often not being in the office, coming in by 10 am and leaves daily by 2:30-3pm to pick up his son. She is aware that Hatem gave me projects that he said was complete months before I came on board.

Jane Lope - can attest to me staying in the office when it's not safe and everyone has gone home.

Leon Deutsch- Me asking him for assistance with canvas, and that Hatem needs to assign me to my courses first, which he should have already done.

Josh Snyder- instructing me to have Hatem assign me to my courses in order for him to help me understand the faculty load

Diane Eure - sit at the the receptionist desk and can attest to the fact I never leave my office, I'm here sometimes before her and always before Hatem. I'm still here when she leaves at 5pm everyday.

Christy Phoenix - she was also surprised to see the disciplinary action, because Hatem hadn't expressed any concerns about me prior to the Email communication on April 22nd. She was also surprise that the situation between he and I warranted a disciplinary action. as well as some of the verbiage Hatem used in the disciplinary action.

Discussed Complaint With : I requested a meeting with Christy Phoenix regarding Hatem and we met on April 28th. I requested a one-on-one meeting with Dr. Millen the evening of the day I received the disciplinary action. We met in her office on May 11th.

Relief Requested : I would like Hatem dismissed or terminated from his position.
I would like Hatem removed as my direct report and I be place under someone else supervision..
I would like the disciplinary action to be removed from my employee record.

Uploaded_Files (if any) :

SIGNATURE AND DATE SUBMITTED:

Electronic_Signature : T. Jacobson for T. Neubal-Johnson

Signature_Date : 07/13/2021

Timestamp : 07/13/2021 12:13:56

Link to Admin Login: <https://bo.enspire.com/dp.asp?AppKey=57b130009cd846469bfa4c3698e2>

EXHIBIT II

Tonya Jacobson

From: Tonya Jacobson
Sent: Thursday, September 9, 2021 4:02 PM
To: Tiffani Johnson
Subject: Notice of Complaint Response
Attachments: Signed RRP Response.pdf; DGBA Appeal Form Fillable.pdf

Professor Neubel-Johnson,

Attached is the Resolution Review Panel's Response to your complaint filed on June 10, 2021.

Attached also is the Appeal Form should you decide to appeal the response findings. If you decide to file an appeal, the completed form must be returned to me no later than September 23, 2021.

Please let me know if you have any questions.

Regards,

Tonya Jacobson
Manager, HR/Employee Relations
Collin College
P: (972) 758-3856
F: (972) 985-3778
ljacobson@collin.edu



**COLLIN COLLEGE BOARD POLICY DGBA (LOCAL)
HEARING OFFICER/RESOLUTION REVIEW PANEL**

FINDINGS/RESOLUTION OF COMPLAINT

Complainant:	Tiffani Neubel-Johnson
Respondent(s):	Hatem Aboalam
Date Complaint Filed:	June 10, 2021
Date of Hearing:	August 5, 2021
Witnesses/Support Person at Hearing:	n/a
Resolution Review Panel:	Mark Fischer, Traci Ramsey, Andrea Szlachtowski
HR Representative:	Tonya Jacobson

Section A. Complaint Types Filed by Complainant and Findings of Hearing Officer or RRP:

Instructions for Hearing Officer/ RRP: Each complaint type filed by Complainant is marked with an "X" in the left hand column of the chart below.

After a review of the complaint, Collin College policy and procedures, the testimony offered by Complainant and witnesses, and further investigation into this complaint, if any, the Hearing Officer/Resolution Review Panel makes the findings marked with an "X" in the right hand column of the chart below regarding each complaint type filed by Complainant. (Please note that the Hearing Officer/Resolution Review Panel may find that additional complaints types are substantiated even though Complainant may not have selected that complaint type, if the Hearing Officer/Resolution Review Panel believes the record and the evidence supports such finding).

NOTE: If a complaint type is "Not Substantiated" in the chart below, relief may not be granted for that complaint type in the chart in Section B below.

Complaint Type(s) Filed by Complainant		Substantiated	Not Substantiated
<input type="checkbox"/>	Complaints concerning an employee's wages, hours, or conditions of work, including performance evaluations or reviews.	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	Violations of Collin College Policy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	Specific allegations of unlawful discrimination or harassment based on sex, race, color, religion, national origin, age, veteran's status, disability, or any other legally-protected classification.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	Specific allegations of unlawful discrimination or retaliation based on the exercise of legally protected rights.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	Specific allegations of adverse personnel action based on the employee's good faith report to an appropriate law enforcement authority of a violation of law by the College District or a College District employee, i.e., "whistleblower complaints."	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Complaints arising from the termination of an at-will employee.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Complaints arising from the termination or non-renewal of a contract employee.	<input type="checkbox"/>	<input type="checkbox"/>

<input checked="" type="checkbox"/>	Any other complaint brought by an employee against another employee, supervisor, manager, student, vendor or the College District.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Section B. Relief Requested:

Instructions for Hearing Officer/RRP: Complete this Section B only if you substantiated a finding of a complaint type and marked "Substantiated" in the chart above. Otherwise, if a complaint type is "Not Substantiated" in the chart above, relief may not be granted for that complaint type.

List Specific Relief Requested by Complainant:		Denied	Granted In Part	Granted
1	Termination of employment of respondent	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Assigned to a different supervisor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Removal of disciplinary action(s) from employee record	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section C. Summary of Complaint

Instructions for Hearing Officer/ RRP: -Write a summary of the complaint, including the facts/evidence that support your findings, as noted in Section A above. You can add as much text as necessary to support your findings and conclusions. This section will continue to expand as you type. Please organize your summary in the order of the relevant complaint types on page one.

On June 10, 2021, Tiffani Neubel- Johnson filed a complaint against her supervisor, Hatem Aboalam regarding a Level 1 disciplinary action she received on May 5, 2021. A resolution review panel (RRP) was appointed to hear and consider her complaint, which was held on August 5, 2021. The RRP reached the following findings:

1. Tiffani Neubel-Johnson's Complaint
Violation of Collin College Policy.

RRP Response

Not Substantiated. There was no evidence of a violation by Hatem Aboalam of Collin College policy.

2. Tiffani Neubel-Johnson's Complaint
Specific allegations of unlawful discrimination or harassment based on sex, race, color, religion, national origin, age, veteran's status, disability, or any other legally-protected classification.

RRP Response

Not Substantiated. The evidence did not support a finding of unlawful discrimination or harassment based on the above protected categories. The RRP also did not find evidence that supports the claim of malicious actions by the supervisor.

3. Tiffani Neubel-Johnson's Complaint
Specific allegations of unlawful discrimination or retaliation based on the exercise of legally protected rights.

RRP Response

Not Substantiated. The evidence did not support a finding of unlawful discrimination or retaliation. The RRP did not find substantial evidence supporting unlawful discrimination or retaliation by the supervisor because the supervisor provided sufficient communication that provided an action plan and support for Tiffani Neubel-Johnson that was not in a retaliatory nature. The RRP panel did not find false accusations based on submitted documentation.

4. Tiffani Neubel-Johnson's Complaint

Any other complaint brought by an employee against another employee, supervisor, manager, student, vendor or the College District.

RRP Response

Not Substantiated. The RRP found there was insufficient evidence to support allegations against another employee, supervisor, manager, student, vendor or the College District.

The RRP did not find misrepresentation of employee performance. The RRP found that the expectation of performance was reasonable but not met by Tiffani Neubel-Johnson.

Tiffani Neubel-Johnson complained that Hatem Aboalam presented her work as his own. The RRP finds the evidence does not support the claim of plagiarism by Hatem Aboalam.

Based on a review of the complaint and available documents and evidence, the RRP does not substantiate the allegations of Tiffani Neubel-Johnson. Therefore, the request for relief is denied.

- **Note:** All other complaints and/or requests for relief not specifically addressed herein are hereby denied.

END OF HEARING OFFICER / RESOLUTION REVIEW PANEL SUMMARY

***Notice of Right to Appeal Hearing Officer/Resolution Review Panel
Findings/Resolution***

Pursuant to DGBA (Local), if the complainant disagrees with the resolution of the Hearing Officer/Resolution Review Panel, he/she may appeal the resolution to the appropriate vice president.

All permitted appeals must be filed in writing using the attached Appeal Form within ten (10) business days of receipt of this resolution by submitting the attached completed and signed Appeal Form to the Chief Human Resources Officer. The Chief Human Resources Officer will log the appeal and forward the appeal and all supporting documents to the appropriate party for review. Please see DGBA (Local) for further information regarding the appeal process.

Hearing Officer/Resolution Review Panel Signatures:

<u>Andrea Blachinski</u>	Date: <u>9.9.21</u>
<u>Nan J. Ramsey</u>	Date: <u>9.9.21</u>
<u>Mohamed</u>	Date: <u>9.9.21</u>

**COLLIN COLLEGE
DGBA (LOCAL) APPEAL FORM INSTRUCTIONS**

The attached form must be used to **appeal** the Level One Response/Findings to a formal written complaint brought pursuant to the Collin College Board Policy DGBA (Local). Appeals are limited by the policy as outlined below.

The following types of complaints may not be appealed beyond Level Two, as outlined by DGBA (Local):

- Complaints concerning an employee's wages, hours, or conditions of work, including performance evaluations or reviews;
- Violations of College Policy;
- Any other complaint brought by an employee against another employee, supervisor, manager, student, vendor or the College District.
- Specific allegations of unlawful discrimination or harassment based on sex, race, color, religion, national origin, age, veteran's status or disability;
- Specific allegations of unlawful discrimination or retaliation based on the exercise of legally protected rights;
- Specific allegations of adverse personnel action based on the employee's good faith report to an appropriate law enforcement authority of a violation of law by the College District or a College District employee, i.e., "whistleblower complaints."
- Complaints arising from the termination of an at-will employee.

The following is the only type of complaint that may be appealed to Level Four, as outlined by DGBA (Local):

- Complaints arising from the termination of a contract employee.

Please note that the attached Appeal Form is a fillable form. Please type in all required information, print and sign the form. All **Appeal Forms** MUST be filed with Human Resources and may be delivered via hand-delivery, fax, email, or U.S. Mail to the following address.

Floyd Nickerson
Vice President of Human Resources
Collin College Higher Education Center
3452 Spur 399, 3rd floor
McKinney, Texas 75069
Fnickerson@collin.edu
Fax: 972-985-3778

Note: All Appeal Forms must be received within ten (10) business days of the Hearing Officer's/ Resolution Review Panel's response.

DGBA (LOCAL) APPEAL FORM

EXHIBIT II



2020-2021 FT Faculty Performance Appraisal

Review Period 9/1/2020 - 8/31/2021



REVIEWER

Hatem Aboalam (Manager)

Tiffani Neubel Johnson

Professor 260 Contract
Position



Overview

Task Instructions

Employee Details

User ID	100588255
User Status	Active
Manager	Hatem Aboalam
Location	Preston Ridge Campus
Full Name	Tiffani Neubel Johnson



Teaching Load

Directions

=====

INSTRUCTIONS

Step 1: Please use the following "[Teaching Load Template](#)" to list all the courses and labs taught, as well as all course releases or extra service agreements for the appraisal period.

Step 2: Save the completed template to your local drive.

Step 3: Attach the completed Teaching Load document to this review by using the "OPTIONS" drop-down button located at the top right of this page.

=====

Rating Scale

Rating	Description
Yes	

Have you completed and attached the "Teaching Load" document?

Reviewer	Rating
Tiffani Neubel Johnson (Self)	Yes



FACULTY COMPETENCY SELF-ASSESSMENT

Directions

INSTRUCTIONS

The faculty annual self-assessment affords faculty an opportunity to provide their supervisor a comprehensive summary of accomplishments and contributions to the five areas evaluated in the annual performance appraisal. The self-assessment focuses on teaching, advising and supporting students, professional development, and college service. Faculty are responsible for completing a self-assessment that provides their supervisor with evidence of professional accomplishments that support the mission and goals of the division, academic department, and the institution.

Faculty will be assessed on the criteria for excellence in the performance of faculty "Duties and Responsibilities" listed in the categories found in the assessment. After reviewing the faculty's self-assessment, the supervisor will choose from among the following ratings to assess the level of accomplishment for each of the performance categories as well as an overall appraisal rating.

Performance Appraisal Ratings

M - Meets the Expected Level of Performance

I - Improvement Needed - Does Not Meet the Expected Level of Performance

Performance Appraisal Rating Definitions:

MEETS: Excellence in teaching, responsible participation in college service, and active professional growth are expected of faculty. One or more of the words usually, frequently, successfully, or effectively applies. Performance is fully satisfactory in all major respects.

IMPROVEMENT NEEDED: Performance is inconsistent or problematic in one or more areas of evaluation. One or more of the terms occasionally, marginally, or inadequately applies. This rating describes performance in which many of the job duties and standards are met, but where improvement in one or more areas is required to meet the criteria for excellence. Goals for improvement must accompany this appraisal to clearly identify specific skills or areas in need of improvement.



FACULTY SELF-ASSESSMENT

The faculty self-appraisal is comprised of a set of performance categories which reflect the principles that guide the Council on Excellence in their peer review of the accomplishments of faculty in pursuit of excellence at Collin College. Additional categories are included which emphasize Collin College core values and the evaluation of annual goals.

DIRECTIONS

For each performance category enter either a concise narrative statement, or a bulleted list, that will provide your Associate Dean or Director with enough information to assist them in assessing your accomplishments, initiatives, and contributions in each area.

To help guide your response, be sure to read the description of Essential Performance Factors that incorporate and describe the particular aspects of excellence that are reflected in the Council on Excellence criteria for each applicable performance category.

NOTE: Bullet points may not always effectively communicate to your Associate Dean or Director the details that would assist them in evaluating your accomplishments and could affect ratings for an individual category or for the overall appraisal. It is recommended to provide a brief, but detailed narrative when appropriate.

I - TEACHING

The Council on Excellence Criteria for Teaching

The primary areas of focus for an excellent faculty member include teaching (the first priority), supporting students, engaging in significant college service, and participating in substantive professional development opportunities.

A Collin College Faculty Member

- Facilitates learning
- Conveys the fundamental body of knowledge in the discipline and how to apply that knowledge
- Teaches students how to critique, analyze, and build upon that body of knowledge
- Shows students how to apply concepts and provide evidence to demonstrate that knowledge
- Employs current materials, applies contemporary research, and uses effective methods of instruction
- Provides meaningful feedback to students in an effective and timely evaluation process

FACULTY SELF-ASSESSMENT OF TEACHING



ESSENTIAL PERFORMANCE FACTORS

Teaching is the central responsibility of faculty members and the most important area of faculty evaluation. While standards may vary somewhat by discipline, certain characteristics of teaching are valued across the College: well-planned, carefully organized courses; effective delivery of material; clear student learning outcome expectations; innovation in subject matter and pedagogy; courses that meet program and College objectives; sufficient opportunity for out-of-class contact between instructor and students; demonstrated effort to keep course content current; use of appropriate methods of feedback and student assessment.

Scholarly work and accomplishments in instructional activities may take on a variety of forms, including guiding independent learning activities and student creative performance, interdepartmental collaboration with colleagues, and development and improvement of curriculum.

In the space below, enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your accomplishments in teaching during the past year.

Comments

Tiffani Neubel Johnson (Self) :

N/A. I have not taught any courses yet.

II - ADVISING AND SUPPORTING STUDENTS

The Council on Excellence Criteria for Faculty Engagement in Student Advising

A Collin College Faculty Member

- Provides advice to students about career and curriculum options
- Directs students to competent help for academic and non-academic problems, i.e., Tutoring, Writing Center, ACCESS, Counseling Center, etc.
- Supports student organizations and events
- Is available to and approachable by students and may provide letters of recommendation in support of student success or education/career objectives

Please Note: Not every bullet item above may apply for every faculty member. In some cases there may be different or additional items that are unique to the faculty member's discipline or academic department.

FACULTY SELF-ASSESSMENT OF ADVISING AND SUPPORTING STUDENTS



ESSENTIAL PERFORMANCE FACTORS

The most important responsibility of individual faculty is to enhance the student learning experience. Successful support of students encompasses approachability and availability to assist students inside and outside of the class; advertising and maintaining office hours; being informed about the degree, certificate, and transfer requirements of programs within the discipline; and being knowledgeable, able to explain, and willing to refer to academic and non-academic college resources.

DIRECTIONS

In the space below, enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in advising and supporting students during the past year. Be sure to include any student-related activities that demonstrate your support of students outside of the classroom. Examples include participation in student organizations as well as attending sports events, PTK induction, student performances, receptions, etc. Some items may be duplicated in the College Service category.

Comments

Tiffani Neubel Johnson (Self) :

N/A. I have not taught any courses yet.

III - PROFESSIONAL DEVELOPMENT

The Council on Excellence Criteria for Professional Development

Collin College Faculty Member

- Remains current and competent in the discipline, staying vigilant and continuously monitoring advances in related scholarship
- Creates and sustains an on-going program of self-development and improved pedagogy
- Seeks opportunities for any of the following:
 - Professional growth (formal research and publication, production in one's art, professional performance, etc.)
 - Presentations before professional societies or other meetings
 - Workshop and conference participation
 - Active involvement in professional associations or community organizations
 - Academic career advancement through course work

FACULTY SELF-ASSESSMENT OF PROFESSIONAL DEVELOPMENT



ESSENTIAL PERFORMANCE FACTORS

Each faculty member is expected to be intellectually active. Professional development may take many forms (see below), including active engagement in intellectual activities within one's own discipline, demonstrating efforts to stay current in one's field.

The following are types of activities that should be included:

- Conferences/workshops attended/conducted
- Professional presentations, papers presented/published/submitted for publication
- Scholarly research or professional creativity
- Collaborating on research projects with students
- Interdisciplinary work with colleagues
- Development of research and collaboration with other professionals
- Active involvement in professional organizations
- Developing and conducting artistic performances
- Coursework recently completed or in progress
- Any other ways in which you remain current in your discipline

DIRECTIONS

Enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in Professional Development activities during the past year.

Please Note: For conferences or workshops, in addition to their title(s), please include a brief description of their benefit to your teaching or professional activities at Collin. You may also choose to attach a copy of any travel summaries that were submitted for COE or Departmental travel (Attachments will need to be loaded in the Supporting Documents section.)

Comments

Tiffani Neubel Johnson (Self) :

* **American Society of Health-System Pharmacists (ASHP)** - Presented on a live webinar - CE for Technician. "Tips, Trick, and Ideas for handling Stress at Home and Work"

American Society of Health-System Pharmacists (ASHP) - Completed training certificate for Diversity, Equity, and Inclusion

***Texas Society of Health-System Pharmacists (TSHP)** - Attended the annual Conference in April of 2021

***Metroplex Society of Health-System Pharmacists (MSHP)** – Appoint to an Officer Position as the Pharmacy Technician Chair/ Liaison.

***American Pharmacists Association (APhA)** - Complete training course for immunization administration by Pharmacy Technicians.

***Working on Canvas training**

***Registered for "Quality Matters Training"**

IV - COLLEGE SERVICE



The Council on Excellence Criteria for College (Community) Service

A Collin Faculty Member

- Actively and productively participates in college-wide, division, and department councils, task forces, and committees
- Creates programs/activities for the district that benefit students
- Performs other service activities designed to further the accomplishment of the college's mission
- Represents the college in the community serviced by the college district
- Engages in professionally-related community service

FACULTY SELF-ASSESSMENT OF COLLEGE SERVICE

ESSENTIAL PERFORMANCE FACTORS

Faculty members should be actively engaged in service at either the program, department, division, or college level, or a combination thereof. College service provides opportunities for faculty to exercise a leadership role and assist the College in attaining its institutional strategic goals and mission. Characteristics of excellent service include dependability, thoughtfulness, active participation and preparedness regarding committee assignments; acceptance of responsibility and leadership roles; helping professional organizations meet goals; helping student organizations meet goals; and providing opportunities for students to interact with communities beyond the College.

DIRECTIONS

Enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in College Service activities during the past year. Include detailed information about the type of service and your role, with title (if applicable) as well as listing achievements and contributions as a result of the service provided.

Please Note: When listing activities, do not include contract activities that are expected of all faculty members such as attending All College Day, graduation, or division meetings, etc.

Comments

Tiffani Neubel Johnson (Self) :

- *Just began meeting with Phi Theta Kappa to become an advisor for the association.*
- *Participated in the Open House Event.*



FACULTY REVIEW OF STUDENT EVALUATIONS

Directions

After reviewing students' evaluations of your courses, please enter a response that will address or confirm the feedback contained in them.

FACULTY REVIEW OF STUDENT EVALUATIONS

Comments

Tiffani Neubel Johnson (Self) :

N/A. I have not taught any courses yet.



Have you added comments in all the sections?

Additional Information

Confirm you have completed all the sections.

Yes, I have completed all the sections.



Faculty Evaluation of Professional Development Goals

Directions

Faculty will list their goals from the appraisal period and indicate the level of accomplishment. Provide explanations for goals that were partially accomplished or not accomplished.

Rating Scale

Rating	Description
Accomplished	Accomplished
Partially Accomplished	Partially Accomplished
Not Accomplished	Not Accomplished



Faculty Goal Setting

Directions

Together, the faculty member and associate dean/director should agree on a set of goals for the faculty member for this academic year. These goals will be updated throughout the year and will be in the next yearly performance appraisal.

Create standalone courses

In order to link credit and CE Pharm Tech programs, there may be one or two courses that need to be created. Professor Neubel-Johnson will work with the credit and CE areas to create course(s) and formalize the pathway.

Start Date
9/1/2021

Due Date
8/31/2022

Goal Perspective
Faculty - Service

Establish Clinical sites

Establish affiliation agreements for clinical sites to accommodate our student's class capacity other than Walgreens.

Start Date
9/1/2021

Due Date
8/31/2022

Goal Perspective
Staff - Department Initiative

Comments

Hatem Aboalam (Manager) :

Per Prof. Neubel-Johnson, we have a pending contact with Walgreens, being in review now. we will have more than 14 sites along with Walgreens once the contract is established. Prof. Neubel-Johnson will establish an affiliation with one more additional retail company. Prof. Neubel-Johnson will also establish an agreement with a hospital clinical site.

All establishment of the agreement will be done prior legal department at Collin College reviewing it.

Student Recruitment

Use "out of the box" thinking to recruit new students into the Pharm Tech program.

Start Date
9/1/2021

Due Date
8/31/2022

Goal Perspective
Staff - Department Initiative



FACULTY COMPETENCY ASSESSMENT

Directions

The faculty self-appraisal is comprised of a set of performance categories which reflect the principles that guide the Council on Excellence in their peer review of the accomplishments of faculty in pursuit of excellence at Collin College. Additional categories are included which emphasize Collin College Core Values and the evaluation of annual goals.

DIRECTIONS

For each performance category enter either a concise narrative statement, or a bulleted list, that will provide your Associate Dean or Director with enough information to assist them in assessing your accomplishments, initiatives, and contributions in each area. To help guide your response, be sure to read the description of **Essential Performance Factors** that incorporate and describe the particular aspects of excellence that are reflected in the **Council on Excellence** criteria for each applicable performance category.

NOTE: Bullet points may not always effectively communicate to your Associate Dean or Director the details that would assist them in evaluating your accomplishments and could affect ratings for an individual category or for the overall appraisal. It is recommended to provide a brief, but detailed narrative when appropriate.

Rating Scale

Rating	Description
Meets the Expected Level of Performance	MEETS: Excellence in teaching, responsible participation in college service and active professional growth are expected of faculty. One or more of the words usually, frequently, successfully, or effectively applies. Performance is fully satisfactory in all major respects.
Improvement Needed	IMPROVEMENT NEEDED: Performance is inconsistent or problematic in one or more areas of evaluation. One or more of the terms occasionally, marginally, or inadequately applies. This rating describes performance in which many of the job duties and standards are met, but where improvement in one or more areas is required to meet the criteria for excellence. Goals for improvement must accompany this appraisal to clearly identify specific skills or areas in need of improvement.

I - TEACHING



The Council on Excellence Criteria for Teaching

The primary areas of focus for an excellent faculty member include teaching (the first priority), supporting students, engaging in significant college service, and participating in substantive professional development opportunities.

A Collin College Faculty Member

- Facilitates learning
- Conveys the fundamental body of knowledge in the discipline and how to apply that knowledge
- Teaches students how to critique, analyze, and build upon that body of knowledge
- Shows students how to apply concepts and provide evidence to demonstrate that knowledge
- Employs current materials, applies contemporary research, and uses effective methods of instruction
- Provides meaningful feedback to students in an effective and timely evaluation process

FACULTY SELF-ASSESSMENT OF TEACHING

ESSENTIAL PERFORMANCE FACTORS

Teaching is the central responsibility of faculty members and the most important area of faculty evaluation. While standards may vary somewhat by discipline, certain characteristics of teaching are valued across the College: well-planned, carefully organized courses; effective delivery of material; clear student learning outcome expectations; innovation in subject matter and pedagogy; courses that meet program and College objectives; sufficient opportunity for out-of-class contact between instructor and students; demonstrated effort to keep course content current; use of appropriate methods of feedback and student assessment.

Scholarly work and accomplishments in instructional activities may take on a variety of forms, including guiding independent learning activities and student creative performance, interdepartmental collaboration with colleagues, and development and improvement of curriculum.

In the space below, enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your accomplishments in teaching during the past year.

Reviewer	Item	Rating
Hatem Aboalam (Manager)	Facilitates learning through effective preparation and organization of course information.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Provides students with the fundamental body of knowledge of his/her discipline and remains current in effective methods of instruction.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Teaches students to apply knowledge and demonstrate understanding.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Provides clear student learning outcome expectations.	Meets the Expected Level of Performance



Hatem Aboalam (Manager)	Employs current materials in classroom presentations and learning experiences.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Uses teaching and learning methods that are appropriate for the discipline.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Employs effective evaluation techniques and provides meaningful feedback to students.	Meets the Expected Level of Performance

Comments

Hatem Aboalam (Manager) :

Professor Neubel-Johnson will teach her first class in Fall 2021. She is working with the program director to ensure her classes reflect rigor and excellence. Her lectures and class presentations should demonstrate original content and convey her position as a subject matter expert.

The category Not Applicable would be more appropriate in this situation however, it was not available

II - ADVISING AND SUPPORTING STUDENTS

The Council on Excellence Criteria for Faculty Engagement in Student Advising

A Collin College Faculty Member

- **Provides advice to students about career and curriculum options**
- **Directs students to competent help for academic and non-academic problems, i.e., Tutoring, Writing Center, ACCESS, Counseling Center, etc.**
- **Supports student organizations and events**
- **Is available to and approachable by students and may provide letters of recommendation in support of student success or education/career objectives**

Please Note: Not every bullet item above may apply for every faculty member. In some cases there may be different or additional items that are unique to the faculty member's discipline or academic department.

FACULTY SELF-ASSESSMENT OF ADVISING AND SUPPORTING STUDENTS



ESSENTIAL PERFORMANCE FACTORS

The most important responsibility of individual faculty is to enhance the student learning experience. Successful support of students encompasses approachability and availability to assist students inside and outside of the class; advertising and maintaining office hours; being informed about the degree, certificate, and transfer requirements of programs within the discipline; and being knowledgeable, able to explain, and willing to refer to academic and non-academic college resources.

DIRECTIONS

In the space below, enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in advising and supporting students during the past year. Be sure to include any student-related activities that demonstrate your support of students outside of the classroom. Examples include participation in student organizations as well as attending sports events, PTK induction, student performances, receptions, etc. Some items may be duplicated in the College Service category.

Reviewer	Item	Rating
Hatem Aboalam (Manager)	Understands current career and curriculum options, degree requirements and course transfer information within the discipline and provides timely and tailored advice to students.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Helps students with education-based problems and/or directs students to appropriate college resources.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Assists students in accessing appropriate college and community resources for non-educational problems.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Is available to and approachable by students.	Meets the Expected Level of Performance

Comments

Hatem Aboalam (Manager) :

Professor Neubel-Johnson will teach her first class in Fall 2021. She has been working on the student handbook and completed the student application packet. She has not conducted any information sessions or meetings with potential students.

The category Not Applicable would be more appropriate in this situation however, it was not available.

III - PROFESSIONAL DEVELOPMENT



The Council on Excellence Criteria for Professional Development

Collin College Faculty Member

- Remains current and competent in the discipline, staying vigilant and continuously monitoring advances in related scholarship
- Creates and sustains an on-going program of self-development and improved pedagogy
- Seeks opportunities for any of the following:
 - Professional growth (formal research and publication, production in one's art, professional performance, etc.)
 - Presentations before professional societies or other meetings
 - Workshop and conference participation
 - Active involvement in professional associations or community organizations
 - Academic career advancement through course work

FACULTY SELF-ASSESSMENT OF PROFESSIONAL DEVELOPMENT

ESSENTIAL PERFORMANCE FACTORS

Each faculty member is expected to be intellectually active. Professional development may take many forms (see below), including active engagement in intellectual activities within one's own discipline, demonstrating efforts to stay current in one's field.

The following are types of activities that should be included:

- Conferences/workshops attended/conducted
- Professional presentations, papers presented/published/submitted for publication
- Scholarly research or professional creativity
- Collaborating on research projects with students
- Interdisciplinary work with colleagues
- Development of research and collaboration with other professionals
- Active involvement in professional organizations
- Developing and conducting artistic performances
- Coursework recently completed or in progress
- Any other ways in which you remain current in your discipline

DIRECTIONS

Enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in Professional Development activities during the past year.

Please Note: For conferences or workshops, in addition to their title(s), please include a brief description of their benefit to your teaching or professional activities at Collin. You may also choose to attach a copy of any travel summaries that were submitted for COE or Departmental travel (Attachments will need to be loaded in the Supporting Documents section.)

Reviewer	Item	Rating
Hatem Aboalam (Manager)	Remains current and competent in the appropriate academic discipline.	Meets the Expected Level of Performance



Hatem Aboalam (Manager)	Regularly participates in external professional meetings, seminars, activities, or conferences that are related to one's discipline, and/or activities that help to support teaching and program development.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Regularly participates in Faculty Development meetings, activities, or programs offered by the District.	Meets the Expected Level of Performance
Hatem Aboalam (Manager)	Engages in activities that help to enhance and promote excellence in teaching that could include any of the following: Instructional technology, pedagogy, presentation skills, classroom management, etc.	Meets the Expected Level of Performance

Comments

Hatem Aboalam (Manager) :

Professor Neubel-Johnson is involved with professional development. Her calendar shows she is involved in multiple seminars and activities related to the Pharmacy Technician profession through several different organizations.

Professor Neubel-Johnson will be attending the Pharmacy Technician Educator's Council, a virtual conference July 26 - 29, 2021.

Professor Neubel-Johnson understands professional development activities must be approved by the program director prior to scheduling.

IV - COLLEGE SERVICE

The Council on Excellence Criteria for College (Community) Service

A Collin Faculty Member

- **Actively and productively participates in college-wide, division, and department councils, task forces, and committees**
- **Creates programs/activities for the district that benefit students**
- **Performs other service activities designed to further the accomplishment of the college's mission**
- **Represents the college in the community serviced by the college district**
- **Engages in professionally-related community service**

FACULTY SELF-ASSESSMENT OF COLLEGE SERVICE



ESSENTIAL PERFORMANCE FACTORS

Faculty members should be actively engaged in service at either the program, department, division, or college level, or a combination thereof. College service provides opportunities for faculty to exercise a leadership role and assist the College in attaining its institutional strategic goals and mission. Characteristics of excellent service include dependability, thoughtfulness, active participation and preparedness regarding committee assignments; acceptance of responsibility and leadership roles; helping professional organizations meet goals; helping student organizations meet goals; and providing opportunities for students to interact with communities beyond the College.

DIRECTIONS

Enter either a concise narrative statement or a bulleted list that provides your Associate Dean or Director with adequate information to assist them in assessing your level of engagement in College Service activities during the past year. Include detailed information about the type of service and your role, with title (if applicable) as well as listing achievements and contributions as a result of the service provided.

Please Note: When listing activities, do not include contract activities that are expected of all faculty members such as attending All College Day, graduation, or division meetings, etc.

Reviewer	Item	Rating
Hatem Aboalam (Manager)	<p>Works individually and/or collaboratively with college employees to accomplish discipline, divisional and college missions, goals and objectives, through service and participation in any of the following:</p> <ul style="list-style-type: none"> • College-wide task forces • Faculty and staff search committees • Advisory groups • Student groups • Faculty advisor • Professionally related community activities on behalf of the college • Organizing, supporting, or helping to plan/execute special events or college outreach 	Improvement Needed

Comments

Hatem Aboalam (Manager) :

Professor Neubel-Johnson's office door remains closed, which sends a message she is not available for collaboration and brainstorming, essential for program success.

V - PROFESSIONALISM

Criteria for excellence: Policies, Procedures, Timelines and Professional Interaction



Reviewer	Item	Rating
Hatem Aboalam (Manager)	Interacts professionally and courteously with students, faculty and staff, including advising and assisting associate faculty when required or appropriate.	Improvement Needed
Hatem Aboalam (Manager)	Performs duties and responsibilities in accordance with established policies, procedures and departmental expectations.	Improvement Needed
Hatem Aboalam (Manager)	Meets timelines for assigned work.	Improvement Needed
Hatem Aboalam (Manager)	Provides timely notice for substitutes and class/schedule changes.	Improvement Needed
Hatem Aboalam (Manager)	Meets classes as scheduled and holds regular office hours.	Improvement Needed
Hatem Aboalam (Manager)	Participates in divisional and departmental meetings.	Improvement Needed

Comments

Hatem Aboalam (Manager) :

A level 1 disciplinary action was delivered on 5/5/21. Areas of improvement were identified, and a weekly meeting was established to assist with task completion. Professor Neubel-Johnson improved her communication by outlining job tasks. For example, she created a Microsoft Teams dashboard to track task completion, encourage supervisor feedback to improve her quality of work. I would like to see Professor Neubel-Johnson take more initiative with program needs, submit work that does not require significant editing, and feel comfortable as a team member within the program.

On 6/14/21, Professor Neubel-Johnson received a Level 2 disciplinary action for disrespectful behavior in an incident with another employee on 6/10/21. Professor Neubel-Johnson is expected to demonstrate Collin's core values in all communication with all employees.



ASSOCIATE DEAN / DIRECTOR'S ASSESSMENT OF STUDENT EVALUATIONS

Directions

Please provide your assessment of faculty performance based on student evaluations.

Student Evaluations - STRENGTHS (required)

Comments

Hatem Aboalam (Manager) :

Not yet evaluated, classes start on 8/23/21. Professor Neubel-Johnson will meet with the Pharmacy Tech program director when the Fall 2021 student evaluations are available to identify strengths.

Student Evaluations - AREAS FOR DEVELOPMENT (required)

Comments

Hatem Aboalam (Manager) :

Not yet evaluated, classes start on 8/23/21. Professor Neubel-Johnson will meet with the Pharmacy Tech program director when the Fall 2021 student evaluations are available to identify areas of development.

Student Evaluations - AREAS OF SPECIAL CONCERN FOR IMMEDIATE IMPROVEMENT (if applicable)

Comments

Hatem Aboalam (Manager) :

Not yet evaluated, classes start on 8/23/21. Professor Neubel-Johnson will meet with the Pharmacy Tech program director when the Fall 2021 student evaluations are available to any potential areas of immediate concern.



FACULTY OVERALL EVALUATION

Directions

Please indicate below the overall appraisal rating for the employee, which best describes a summary of the above ratings and comments.

Rating Scale

Rating	Description
Improvement Needed	IMPROVEMENT NEEDED: Performance is inconsistent or problematic in one or more areas of evaluation. One or more of the terms occasionally, marginally, or inadequately applies. This rating describes performance in which many of the job duties and standards are met, but where improvement in one or more areas is required to meet the criteria for excellence. Goals for improvement must accompany this appraisal to clearly identify specific skills or areas in need of improvement.
Meets the Expected Level of Performance	MEETS: Excellence in teaching, responsible participation in college service and active professional growth are expected of faculty. One or more of the words usually, frequently, successfully, or effectively applies. Performance is fully satisfactory in all major respects.

OVERALL EVALUATION

Reviewer	Rating
Hatem Aboalam (Manager)	Improvement Needed
Comments	

Hatem Aboalam (Manager) :

Professor Neubel-Johnson was brought onboard four months ago to assist the program director with the necessary tasks to move the program forward. Professor Neubel-Johnson's prior experience as a program director was thought to be very valuable in this situation. Four months later, there are gaps and areas of concern that have impeded the progress of the program. As of July 27, 2021, there are three students who have applied when the goal was fourteen students registered for Fall 2021. The expectation was that we would be further along at this point.

Professor Neubel-Johnson received a level 1 disciplinary action on 5/5/21. Areas of improvement were identified, and a weekly meeting was established to assist with task completion. Professor Neubel-Johnson improved her communication by outlining job tasks. She created a Microsoft team's dashboard to track task completion, encourage supervisor feedback to improve her quality of work. I would like to see Professor Neubel-Johnson take more initiative with program needs, submit work that requires fewer edits, and feel comfortable as a team member within the program.

As a result of the Level 1 disciplinary action, Professor Neubel-Johnson has been working on the following:

- Attend weekly meetings with the program director and the dean.
- Meet weekly with the program director to demonstrate progress towards tasks and goals.
- Develop courses for first semester and submit for review.



- Follow up and evaluate students' checklists prior to starting first semester.

On 6/14/21, Professor Neubel-Johnson received a Level 2 disciplinary action for behavior 6/10/21. Professor Neubel-Johnson is expected to demonstrate Collin's core values in all communication with all employees.

As a result of the Level 2 disciplinary action, an overall evaluation of Needs Improvement has been selected.



Manager and Employee Meeting

Directions

IMPORTANT: PLEASE READ BEFORE CONTINUING

Managers, complete the following steps before clicking "Submit":

1. Schedule and conduct a performance review meeting with the employee to discuss the performance appraisal.
2. Print two copies of this review and bring them to the meeting.
3. During the meeting, go over the entire review, provide feedback, and address any employee concerns.
4. Make any necessary changes to this review online and confirm employee's acceptance at the meeting.

If you have not yet completed steps 1-4, please click "Save and Exit" – do not click "Submit."

During the manager-employee meeting, once steps 1-4 are completed:

1. In the presence of the employee, the manager should click "Submit." The review can no longer be modified.
2. The employee should log in, sign the evaluation, submit, and log out.

Additional Information

Please confirm you have met and reviewed your assessment with the employee.

Yes, I have met and reviewed my assessment with the employee.



SIGNATURE AND ACKNOWLEDGMENT

Directions

I have reviewed and discussed this performance appraisal with the Associate Dean/Director.

X Tiffani Neubel-Johnson

Self

7/30/2021

Date

X Hatem Aboalam

Manager

8/11/2021

Date

EXHIBIT JJ

Performance Improvement Plan

Employee Name:	Tiffani N. Neubel-Johnson	Employee CWID:	100588255
Job Title:	Faculty Staff	Department:	Pharmacy Technician
Immediate Supervisor:	Hatem Aboalam	Date of Review:	7/27/2021

Job Responsibilities/Priorities

List the employee's primary job responsibilities that require attention and describe the specific improvement that is needed to meet minimum expectations. Note that there may be other performance deficiencies that are not listed but may be addressed with future action plans once performance in the areas listed below is corrected.

Job Performance Deficiency: Poor quality of work

Professor Neubel-Johnson's proposal for the student program application did not include updated policies on immunization, background checks, and drug screening information which is an essential requirement for admission to the program. Tiffani is expected to improve her quality of work as outlined in the level 1 on 5/5/21.

Specific Results Required for Acceptable Improvement:

- Professor Neubel-Johnson is expected to ask questions to the program director when needed.
- When feedback is given, Professor Neubel-Johnson is expected to remain receptive to suggestions and recommendations.
- Professor Neubel-Johnson is encouraged to work with a designated mentor when it becomes available. Director Hatem, is in process of identifying a mentor; will notify when available.
- Professor Neubel-Johnson is encouraged to prioritize her workday to deliver tasks on time.
- Weekly meetings will be scheduled by the program director to answer questions and clarify Professor Neubel-Johnson's understanding of assigned tasks and reevaluate priorities.

Date for Improvement to be Completed: January 31, 2022

Job Performance Deficiency: Improve communication.

On 6/14/21, Professor Neubel-Johnson received a Level 2 disciplinary action for behavior deficiency and disrespectful compunction that resulted in an incident with another employee on 6/10/21 followed by a statement from the employee.

Specific Results Required for Acceptable Improvement:

- Professor Neubel-Johnson is expected to demonstrate Collin's core values in all communication with all employees.
- Professional development activities must be approved by the program director prior to scheduling and participation.
- Professor Neubel-Johnson is encouraged to create an inviting environment for collaboration.

Date for Improvement to be Completed: January 31, 2022

Job Performance Deficiency: Commitment to Program Success

When asked to familiarize herself with faculty starting line, after 28 days, Professor Neubel-Johnson stated that she had no access and did not seek assistance to gain access.

Specific Results Required for Acceptable Improvement:

- Professor Neubel-Johnson is expected to take initiatives to resolve program issues, making the program director aware of her progress along the way.
- Professor Neubel-Johnson is expected to be engaged and aware of program goals and is expected to contribute and prioritize long term program objectives.

Date for Improvement to be Completed: January 31, 2022

Changes to template verbiage must be approved by HR.

Associate Dean Initials: _____
Employee Initials: _____
HRC Initials: _____

Development Plan and Ongoing Support

Improvement plan, Dates from 8/23/21-1/31/22

- Attend weekly meetings with the program director and the dean.
- Meet weekly with the program director to demonstrate progress towards tasks and goals.
- Develop courses for first semester and submit for PHRA 1205 and PHRA 1209. Course Calendar is due by 8/23/21.
- Follow up and evaluate students' checklists prior to starting first semester.
- Improve communication with employees and establish respectful behavior as Collin College's

Page 2 of 8

core values mandate.

Support to be provided by supervisor (e.g. training, equipment, observation, procedures):

1. Follow-up Meeting Schedule:

- Attend weekly meetings with the program director and the dean on Mondays.
- Meet weekly with the program director to demonstrate progress towards tasks and goals on Thursdays.

2. Training and Resources:

- The Faculty start line course is currently in progress per Professor Neubel-Johnson, will follow up weekly in meetings to provide support to Professor Neubel-Johnson and answer questions. Last follow up was on 7/22 for the courses build up, Professor Neubel-Johnson shared her screen during a meeting with the program director and showed the progression of one course for the PHRA 1201, currently working on organizing the two assigned courses, PHRA 1209 and PHRA 1205, adding the lectures and finalizing the course syllabus.
- Attending Canvas basic training course with CNA program director Leon Deutch, offering:

August 4th 9:00 am – Noon---Attended

Topics will include:

Canvas Basics. Getting started as a new professor.

Cengage Unlimited. Incorporating Cengage Mindtap into your course.

Concourse Syllabus: How to create your course syllabus in Canvas.

3. Other Support Provided (coaching, classroom visit, etc.):

- To improve quality of communication, the program director will provide a copy of Emotional Intelligence 2.0, a book by Jean Greaves and Travis Bradberry, a monthly discussion will be required to discuss the outcomes from the book for November and December.
- Utilize in learning partnering with LinkedIn Learning to complete helpful courses regarding communication and receiving feedback such as: "Giving and receiving Feedback" course and "Interpersonal communication" to be completed by 1/31/2022. Additional courses may be assigned by the program director as seen beneficial.

The Performance Improvement Plan, Development Plan, and Ongoing Support as provided above have been reviewed and approved by a member of human resources.

HR Liaison Reviewed and Approved:

Date:

8/16/2021

Plan Establishment Signatures:

Employee:

Tiffany Johnson

Date:

8/16/21

Associate Dean:

Date:

Dean:

Michelle Millen

Date:

9.1.2021

VP/P:

Mark A. Smith

Date:

9/2/2021

HR Liaison Received and Recorded:

Date:

9/8/2021

Director

8/16/21

Follow-up Review

Please summarize meeting details and results. If additional supporting evidence is necessary, please note what the evidence is and attach documentation. All attached documentation should be initialed by the employee and associate dean.

Follow-up Discussion #1

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #2

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #3

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #4

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Review

Please summarize meeting details and results. If additional supporting evidence is necessary, please note what the evidence is and attach documentation. All attached documentation should be initialed by the employee and associate dean.

Follow-up Discussion #5

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #6

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #7

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #8

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Review

Please summarize meeting details and results. If additional supporting evidence is necessary, please note what the evidence is and attach documentation. All attached documentation should be initialed by the employee and associate dean.

Follow-up Discussion #9

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #10

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #11

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Follow-up Discussion #12

Date:

Results:

Employee Initials: _____
Associate Dean Initials: _____

Final Outcome of Performance Improvement Plan

_____ Employee has achieved the required improvement described above.

_____ Employee has not achieved the required improvement in the following area(s):

Plan Completion Signatures:

Employee:	_____	Date:	_____
Associate Dean:	_____	Date:	_____
Dean:	_____	Date:	_____
VP/P:	_____	Date:	_____
HR Liaison Received and Recorded	_____	Date:	_____

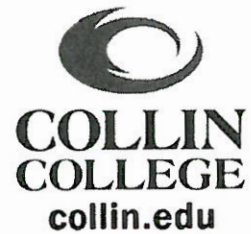


EXHIBIT KK

Archived: Thursday, June 5, 2025 11:51:34 AM
From: Hatem Aboalam
Sent: Monday, August 16, 2021 3:44:59 PM
To: Tiffani Johnson
Cc: Christy Phoenix Maxine Walker Michelle Millen
Subject: PIP Meeting Request
Importance: Normal
Sensitivity: None

Hello Tiffani,

I am following up on your request today during the PIP meeting as you requested to have the audiobook version of the "Emotional Intelligence 2.0" recommended book. The request has been secured at the library, and I will notify you once it becomes available.

Thank you,

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

EXHIBIT LL

Christina Canales

From: cougarhr@collin.edu
Sent: Wednesday, September 29, 2021 2:45 PM
To: Christina Canales; Jay M. Rogers; Benefits
Subject: Reasonable Accommodation Request

WARNING: The sender of this email could not be validated.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

Accommodation requested by:

CWID : 100588255
Full Name : Tiffani Neubel-Johnson
Contact Phone Number : 9725531127
Email Address : tnjohnson@collin.edu
Full or Part Time: Full-time
Faculty or Staff: Faculty
Semester for Request : Fall2021
Preferred Communication Method: CALL/Text/Email
Supervisor Name: Hatem Aboalam
Supervisor Phone Number: 972-549-6393
Date : 09/29/2021 14:44:58

A. Question to clarify accommodation requested.

Accommodation requested : I'm requesting approval for learning materials about ADHD as it relates to me and how a supervisor can work with an employee with ADHD. Modified work schedule to office hours and teaching schedule, and ability to telework from home as need, at no more than 2 days per week to assist with unexpected psychosis episodes related to my disabilities.

If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore :
Yes

Explanation : I have a combination of videos, articles, lectures, and websites with the specifics of my challenges.

Is your accommodation request time sensitive : Yes

Explanation : I need this approval immediately because I'm required to read a book to improve my work relationship with my supervisor. However; the skills that the book is teaching are the direct opposite of my disability. Meaning, I did not have the neuro capability to produce the expected outcomes from reading the book.

B. Questions to document the reason for accommodation request.

What, if any, job function are you having difficulty performing : Work schedule, class schedule, and regular deadlines.

What, if any, employment benefit are you having difficulty accessing :

What limitation is interfering with your ability to perform your job or access an employment benefit: My supervisor doesn't understand my disability nor what accommodation is needed to improve my work performance.

Have you had any accommodations in the past for this same limitation: Yes

If yes, what were they and how effective were they: My service dog.

If you are requesting a specific accommodation, how will that accommodation assist you : These accommodations will increase my work productivity, improve my ability to focus, and reduce anxiety and psychosis behavior.

C. Other.

Please provide any additional information that might be useful in processing your accommodation request :

D. Acknowledgements

I understand that I am responsible for providing documentation of my disability that supports this request for accommodation(s). I understand my request for accommodation(s) will be discussed in a collaborative manner with my supervisor and, if necessary, other appropriate Collin College personnel. I understand that if, in the future, the nature of my disability or my work assignment changes, I have the right to request other accommodation(s).:

Yes

I understand that I must provide documentation from an appropriate health care professional to establish my eligibility as a person with a disability. I further understand it is my responsibility to sign the necessary release forms with that individual and have my documentation sent to:

Christina O. Canales
Manager, HR Benefits
Collin County Community College District
3452 Spur 399
McKinney, TX 75069
(972) 599 - 3164
Fax: (972) 599 - 3156:

Yes

EXHIBIT MM

Archived: Tuesday, June 3, 2025 11:50:40 AM
From: [Tiffani Johnson](#)
Sent: Wednesday, December 15, 2021 9:43:36 AM
To: [Christina Canales](#)
Cc: [Tiffani Neubel-Johnson](#)
Subject: RE: Requested Accommodation
Importance: Normal
Sensitivity: None

Hi Christina,

I apologize for the delay.

The modified schedule would be:

- * 8 to 5 work schedule for days I'm not teaching or do not have morning classes.
- * Teaching modality for feasible courses.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christina Canales
Sent: Tuesday, December 7, 2021 11:40 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Tiffani Neubel-Johnson <tneubel26@gmail.com>
Subject: RE: Requested Accommodation

Hi Tiffani, I have a couple of questions:

On the Modified work schedule to Office hours and teaching schedule – can you clarify if you are wanting to modify your office hours, teaching schedule and/or work schedule as it relates to perhaps an 8 to 5 schedule?

Thanks,
Christina

From: Christina Canales <ccanales@collin.edu>
Sent: Friday, November 19, 2021 2:26 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Tiffani Neubel-Johnson <tneubel26@gmail.com>
Subject: Re: Requested Accommodation

Hey Tiffani,

Thank you so much for sending. I'll take a look and get back with you.

Thank you,
Christina Canales
HR, Benefits Manager

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Friday, November 19, 2021 2:17:08 PM
To: Christina Canales <ccanales@collin.edu>
Cc: Tiffani Neubel-Johnson <tneubel26@gmail.com>
Subject: Re: Requested Accommodation

Hi Christina,

I'm following up on our last communication regarding my accommodation request. Were you able to confirm if the supervisors' training covered the specified topic of my condition? During a meeting with Hatem and Dean Millen, she said they never completed any pieces of training that covered certain disabilities.

I've attached a letter with a collaborated list of accommodations from my psychiatrist and primary care physician with the intent to cover any current and future accommodations. I hope this is what you were requesting.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

Pharmacy Technician Professor

Office#: 972-553-1127

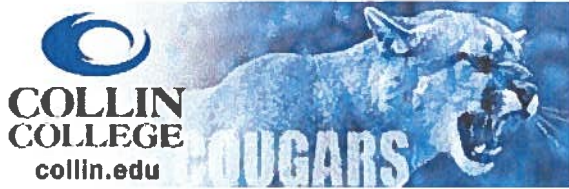
TNJohnson@Collin.edu

Collin College Technical Campus

2550 Bending Branch Way

Allen, TX 75013

Office: A210B



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From: Tiffani Johnson
Sent: Monday, October 11, 2021 3:15 PM
To: Christina Canales <CCanales@collin.edu>
Subject: RE: Requested Accommodation

Good afternoon Christina,

- * Are you wanting to provide separate training materials for your supervisor(s)? They do complete required training that covers this so once I confirm that that is what you are wanting to do, I can double check but I do not believe you would be able to bring unapproved materials but – let me make sure. **Yes, if the training they've already completed did not cover executive functions.**
- * Modified work schedule to office hours and teaching schedule, and ability to telework from home as need, at no more than 2 days per week to assist with unexpected psychosis episodes related to my disabilities.
 - * The information from your physician would need to substantiate this. **I will request my physician to provide this information.**

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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disseminate this information. Please call the sender immediately or reply by email and destroy all copies of the original message, including attachments.

From: Christina Canales
Sent: Monday, October 11, 2021 2:09 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Requested Accommodation

Hi Tiffani,

I need information as it relates to what you're asking for not everything. Since

- * Approval for learning materials about ADHD as it relates to me and how a supervisor can work with an employee with ADHD.
 - * This looks to be detailed in your response below:
 - * Are you wanting to provide separate training materials for your supervisor(s)? They do complete required training that covers this so once I confirm that that is what you are wanting to do, I can double check but I do not believe you would be able to bring unapproved materials but – let me make sure.
- * Modified work schedule to office hours and teaching schedule, and ability to telework from home as need, at no more than 2 days per week to assist with unexpected psychosis episodes related to my disabilities.
 - * The information from your physician would need to substantiate this.

Thanks,

Christina O. Canales, MBA, MS
HR Manager, Benefits
Ph: (972) 599-3164
F: (972) 599-3156
Benefits Team
Ph: (972) 599 – 3152
Benefits@collin.edu

"Be still, and the world is bound to turn herself inside out to entertain you. Everywhere you look, joyful noise is clanging to drown out quiet desperation". – Barbara Kingsolver

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Friday, October 8, 2021 12:54 PM
To: Christina Canales <ccanales@collin.edu>
Subject: RE: Requested Accommodation
Importance: High

Good morning Christina,

Thank you for responding to my request.

So I can provide or request the proper documentation, so I have a few questions to clarify to provide the medical information related to these needs.

1. *Are you asking for specifics/details other than what was stated in the letter I submitted?*
2. *Do you need the information to come from me? Or my physician?*
3. *If you need the information from my doctor's documents, does it need to be on a specific form? Or a letter from the*

doctor explaining the symptoms?

My answers to answer your questions to below in blue:

Can you please clarify the learning materials you are requesting

Not a request, but I'm asking for your approval for the learning materials and information I already have.

They are meant to educate supervisors about the disability and ways of working with an employee with the disability.

I've added a few links that have been most effective in the past, also can answer your question regarding the medical information related to my needs.

I've attached a document with additional resources if the list below isn't enough.

List of youtube videos & Websites I'm requesting to be approved.

Videos for Teaching Supervisors about ADHD	JAN Accommodation Toolkit
MHA ADHD & ADD	MHA OCD
JAN - ADHD	JAN - OCD

Are you wanting to take leave for the 2 days? *No, Ma'am, this is an as-needed accommodation.*

We, the College, have no work-from-home/telework policy but this will still be reviewed. *I hope this will be reconsidered based on my health request.*

The requested modification sounds a bit like FMLA so I wanted to confirm. In the past, it hasn't been approved as FMLA but an ADA accommodation request. However, Collin College may have a different way of addressing this. I'm open to providing any additional information upon request.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Christina Canales

Sent: Friday, October 8, 2021 8:34 AM

To: Tiffani Johnson <tnjohnson@collin.edu>

Subject: Requested Accommodation

Hi Tiffani,

We are in receipt of your requested accommodation for the following:

- * Approval for learning materials about ADHD as it relates to me and how a supervisor can work with an employee with ADHD.
- * Modified work schedule to office hours and teaching schedule, and ability to telework from home as need, at no more than 2 days per week to assist with unexpected psychosis episodes related to my disabilities.

Please provide us with the medical information as it relates to these needs. In the meantime, I have the following questions:

Can you please clarify the learning materials you are requesting

Are you wanting to take leave for the 2 days? We, the College, have no work-from-home/telework policy but this will still be reviewed. The requested modification sounds a bit like FMLA so I wanted to confirm.

Once medical information is received, I will proceed.

Thanks,

Christina O. Canales, MBA, MS
HR Manager, Benefits
3452 Spur 399, Suite 346
McKinney, Texas 75069

Ph: (972) 599-3164

F: (972) 599-3156

Benefits Team

Ph: (972) 599 – 3152

Benefits@collin.edu

"Be still, and the world is bound to turn herself inside out to entertain you. Everywhere you look, joyful noise is clanging to drown out quiet desperation". – Barbara Kingsolver



EXHIBIT NN



WELLMED

AT Redbird Square

3107 W Canip Wisdom Road, Suite 170

Dallas, TX 75237
Phone (972)942-7700
Fax (972)942-7701

11/18/2021

To Whom It May Concern:

Patient Tiffani N. Neubel- Johnson has been diagnosed with a lifetime of Neuro Impairment and mental disorders, attention deficit hyperactivity disorder (ADHD), obsessive-compulsive disorder (OCD), post-traumatic stress disorder (PTSD), and major depression disorder (MDD). The symptoms and psychosis associated with these are specific to each patient.

ADHD is a genetic neurodevelopmental disorder that has to do with regulating executive functions and related behaviors. Impairments include attention, concentration, memory, motivation and effort, basic self-care, hyperactivity, organization, and social skills.

OCD is a mental health disorder that occurs when a person gets caught in a cycle of obsessions and compulsions. Obsessions are unwanted, intrusive thoughts, images, or urges that trigger intensely distressing feelings. Compulsions are behaviors an individual engages in attempting to get rid of the obsessions and/or decrease their distress. Impairments include lack of time management, graphophobia, symmetry obsessions with ordering, arranging, counting, and equilibriums.

PTSD is a mental health disorder in which people experience various symptoms following exposure to a traumatic event. These may include flashbacks, nightmares, intrusive thoughts, anxiety, avoidance, and changes in mood and thinking.

MDD is a persistent sadness, a depressed mood, diminished interest in previously enjoyable activities, isolation and other symptoms that interfere with the ability to function in daily life. This impairment can last up to two weeks or longer.

Mrs. Johnson's condition—when viewed in its active state and without considering mitigating measures like medications, therapies, coping skills and other accommodations—substantially limits major life activity, as compared to most people without limitations, including but not limited to the impairments listed above.

Reasonable accommodations will significantly help alleviate her symptoms, manage her conditions, and succeed in her work. Requested accommodations are as follows but limited to (See page two).

Thank you for your consideration in this matter. **Accommodations for Patient Tiffani N. Neubel-Johnson**

Services:

- Psychiatric service dog
- Assign a mentor/ job coach to teach/reinforce job duties
- Disability Awareness / Etiquette Training for Supervisors and Other Related Co-workers.

- Employee Assistance Program

Products:

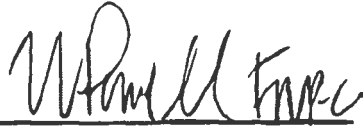
- Window or door shades
- Multiple Monitors
- Speech Recognition / Dictation Software
- Text Audio
- Screen Reading Software
- Applications (apps)
- Apps for Organization/ Time Management
- Electronic Organizers
- Organization Software
- PDAs, iPad, Tablet, Notetakers, and Laptops
- Timers and Watches
- Wall Calendars and Planners
- Ergonomic Equipment
- Noise cancellation equipment, devices, or software

Strategies:

- Additional Completion Time for Training, Projects, and Other Job Duties as Assigned
- Telework, Work from Home, Working Remotely
- Worksite Redesign / Modified Workspace
- Uninterrupted Work Time
- Uninterrupted "Off" Work Time
- Flexible Schedule
- Support Person
- Adjust method of supervision
- Outline Primary and Marginal Functions
- Recorded Directives, Messages, Materials
- Job Structuring / Restructuring
- Written Instructions

- Modified meeting schedules (more/fewer days and/or durations per day, week, month, year) and formats (in-person, virtual, by phone)
- Checklist
- Task Separation
- Task Flow Chart by semester and fiscal year.

Signature:



Date:11/18/2021

Nikki Powell F.N.P.-C

Doctors helping patients for more than 25 years



EXHIBIT 00



Office of Hearings Operations
HARWOOD CENTER
1999 Bryan St
SUITE 2300
DALLAS, TX 75201-9605

Date: February 14, 2024

Tiffani Nicole Neubel Johnson
2615 Summerview Lane
Lancaster, TX 75146

Notice of Decision – Fully Favorable

I carefully reviewed the facts of your case and made the enclosed fully favorable decision. Please read this notice and my decision.

Another office will process my decision. That office may ask you for more information. If you do not hear anything within 60 days of the date of this notice, please contact your local office. The contact information for your local office is at the end of this notice.

If You Disagree With My Decision

If you disagree with my decision, you may file an appeal with the Appeals Council.

How To File An Appeal

To file an appeal you must ask in writing that the Appeals Council review my decision. The preferred method for filing your appeal is by using our secure online process available at <https://www.ssa.gov/benefits/disability/appeal.html>.

You may also use our Request for Review form (HA-520) or write a letter. The form is available at <https://www.ssa.gov/forms/ha-520.html>. Please write the Social Security number associated with this case on any appeal you file. You may call (800) 772-1213 with questions.

Please send your request to:

Social Security Administration
Office of Appellate Operations
6401 Security Blvd
Baltimore, MD 21235-6401

Form HA-1.76 (07-2023)

Suspect Social Security Fraud?

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

See Next Page



Time Limit To File An Appeal

You must file your written appeal within 60 days of the date you get this notice. The Appeals Council assumes you got this notice 5 days after the date of the notice unless you show you did not get it within the 5-day period.

The Appeals Council will dismiss a late request unless you show you had a good reason for not filing it on time.

What Else You May Send Us

You may send us a written statement about your case. You may also send us new evidence. You should send your written statement and any new evidence **with your appeal**. Sending your written statement and any new evidence with your appeal may help us review your case sooner.

How An Appeal Works

The Appeals Council will consider your entire case. It will consider all of my decision, even the parts with which you agree. Review can make any part of my decision more or less favorable or unfavorable to you. The rules the Appeals Council uses are in the Code of Federal Regulations, Title 20, Chapter III, Part 404 (Subpart J).

The Appeals Council may:

- Deny your appeal,
- Return your case to me or another administrative law judge for a new decision,
- Issue its own decision, or
- Dismiss your case.

The Appeals Council will send you a notice telling you what it decides to do. If the Appeals Council denies your appeal, my decision will become the final decision.

The Appeals Council May Review My Decision On Its Own

The Appeals Council may review my decision even if you do not appeal. They may decide to review my decision within 60 days after the date of the decision. The Appeals Council will mail you a notice of review if they decide to review my decision.

When There Is No Appeals Council Review

If you do not appeal and the Appeals Council does not review my decision on its own, my decision will become final. A final decision can be changed only under special circumstances. You will not have the right to Federal court review.



See Next Page

Form HA-L76 (07-2023)

Your Right To Representation In An Appeal

If you appeal, you may choose to have an attorney or other person help you. Many representatives do not charge a fee unless you win your appeal. Groups are available to help you find a representative or, if you qualify, to give you free legal services. Your local Social Security office has a list of groups that can help you in this process.

If you get someone to help you with your appeal, you or that person must let the Appeals Council know. If you hire someone, we must approve the fee before he or she is allowed to collect it.

If You Have Any Questions

1. Visit www.ssa.gov for fast, simple, and secure online service.
2. Call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing, call TTY 1-800-325-0778. Please mention this notice and decision when you call.
3. You may also call your local office at (866) 931-4958.

SOCIAL SECURITY
2475 CLIFF CREEK CROSS
DALLAS, TX 75237-3867

Evelyn Maiben
Administrative Law Judge

Enclosures:
Decision Rationale

4. The claimant does not have an impairment or combination of impairments that meets or medically equals the severity of one of the listed impairments in 20 CFR Part 404, Subpart P, Appendix 1 (20 CFR 404.1520(d), 404.1525 and 404.1526).

5. After careful consideration of the entire record, the undersigned finds that the claimant has the residual functional capacity to perform a full range of work at all exertional levels but with the following nonexertional limitations: the claimant can understand, remember, and carry out simple instructions; she can sustain attention and concentration for simple tasks requiring little independent judgment and minimal variations and perform in a work environment free of fast-paced production requirement; and she can occasionally interact with the public. In addition, the claimant can work 85% of the workday.

In making this finding, the undersigned has considered all symptoms and the extent to which these symptoms can reasonably be accepted as consistent with the objective medical evidence and other evidence, based on the requirements of 20 CFR 404.1529 and SSR 16-3p. The undersigned also considered the medical opinion(s) and prior administrative medical finding(s) in accordance with the requirements of 20 CFR 404.1520.

The claimant has the following degree of limitation in the four broad areas of mental functioning set out in the disability regulations for evaluating mental disorders and in the mental disorders listings in 20 CFR, Part 404, Subpart P, Appendix 1: a moderate limitation in understanding, remembering, or applying information; a moderate limitation in interacting with others; a moderate limitation in concentrating, persisting, or maintaining pace; and a mild limitation in adapting or managing oneself.

The claimant, a younger individual at all times relevant to this case, has an associate degree and past vocationally relevant work as a pharmacy technician, college instructor, and retail assistant manager. The claimant alleges she is disabled due to mental limitations. She testified she has memory loss and that it takes her a long time to complete duties. She also stated that she has impulsivity issues. The claimant described that she cannot get up in the morning on her own, her husband gives her medications at 4am so she can get up at 6am. She explained that she receives counseling and medication management through Metro Care Services. However, she said that the medications make her drowsy. The claimant also stated that she has ongoing memory loss, has blackout where she loses track of time, and cannot remember where she puts things. She stated she has to write down everything and is easily distracted. She testified that her ADHD medications help her ability to focus, but do not work as well as they used to. In addition, the claimant stated that she takes medications for bipolar disorder. She alleges mood swings with impulsivity. She stated she had difficulty completing things she starts and has episodes of sleepiness. She testified that it takes her 3 to 4 hours to grocery shop. She stated she gets only about two hours of sleep a night. The claimant stated that on a typical day, she gets up and lets the dogs out. She will take her children to school and then try and do certain tasks. However, she stated she is easily distracted. For example, once her husband was out of town and she had to prepare breakfast for her sons, but she got distracted and rearranged the freezer instead, making the children late to school. She also stated that she sometimes drives the boys' home from school. She stated that she cannot control her thoughts.

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By March 2023, the claimant reported ongoing irritability, but denied problems with anger and aggression. She also was sleeping well and continued to deny delusion, paranoia, suicidal ideation, and auditory and visual hallucinations. On exam, the claimant again had intact memory but a constricted affect and anxious mood. (Exhibit 21F p.8-11). One month later, the claimant was argumentative about treatment notes indicating she was noncompliant with medications. She admitted to not always taking her medications as prescribed but stated that she had done so for a reason. She stated that the full dose of Seroquel was too sedating. In addition, she did not want the voices in her head to go away completely because she does not have any other friends with whom to talk. Moreover, she denied depression but was advised that the reason she did not feel depressed was probably because she had been on Wellbutrin for a long time. The claimant was noted to be unpredictable and was encouraged to comply with prescription instructions. (Exhibit 22F p.25). In May 2023, the claimant requested to be transferred to another provider. She stated that she was not happy with the documentation by her current provider and that things in her medical records had not been documented accurately. She was significantly anxious

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during the session but denied psychotic symptoms and mania. On exam, the claimant again had intact memory but an anxious mood and constricted affect. She agreed to a re-evaluation in two weeks (Exhibit 22F p.31-32). One week later, the claimant reported she wanted to focus on managing her OCD. She again explained that she had an alternate personality, named Tiffany (with a y), and that Tiffany is the caregiver, and Tiffani (with an i) is the wild child (Exhibit 22F p.34).

Later that month, the claimant began seeing a new psychiatrist. She complained of difficulty sleeping, poor appetite, psychomotor retardation, difficulty getting up and doing things, and worsening depression. She also reported low motivation, being easily distracted, mood swings, irritability, racing thoughts, and manic episodes. She explained she had forgotten to pay her water bill and her water was shut off. She also reported manic purchases. She stated she had an alter named Tiffany and OCD symptoms. On exam, the claimant had poor impulse control and insight. She had impaired memory and pressured speech. Moreover, she had a blunted affect and anxious and irritable mood. She was diagnosed with bipolar I disorder, PTSD, GAD, OCD, ADHD, and dissociative identity disorder. (Exhibit 22F p.37-38).

Although the claimant's daily activities are not severely limited, they are somewhat restricted and are consistent with the residual functional capacity established in this decision. The claimant testified that she cannot get up in the morning on her own. She stated she has to write down everything and is easily distracted. She testified that it takes her 3 to 4 hours to grocery shop and that she gets only about two hours of sleep a night. The claimant stated that on a typical day, she gets up and lets the dogs out. She will take her children to school and then try and do certain tasks. However, she stated she is easily distracted. Moreover, in her function report, the claimant admitted she could prepare simple meals and do laundry and cleaning but is easily distracted and often does not complete the tasks. She also stated she could drive and manage finances, but will forget to pay bills, such as when her water was cut off for not paying the bill.

The medical opinions of record also support the above residual functional capacity. The state agency experts opined that the claimant's mental impairments were nonsevere (Exhibits 2A, 4A). The undersigned finds their opinions unpersuasive. New evidence has been submitted since these experts conducted their review, which obviously diminishes the value of those opinions. This includes evidence of the claimant's dissociative identity disorder diagnosis, as well as her dispute with her provider about noncompliance and subsequent transfer to a new provider. In addition, the state agency experts failed to consider adequately the claimant's subjective, but consistent, reports of racing thoughts and manic episodes.

The claimant's primary care provider, Nikki Powell, FNPC, provided several statements concerning the claimant's ability to work. In December 2020, Ms. Powell opined that the claimant was entitled to FMLA from her employer due to symptoms of ADHD, OCD, PTSD, and MDD including unpredictable psychosis, persistent anxiety, difficulty following through, and difficulty processing information. She opined that the claimant would be incapable of employment from November 24, 2020, through January 24, 2021. (Exhibit 13E p.13-16). However, this pre-dates the alleged onset of disability, and Ms. Powell did not address the claimant's mental capacity for work since January 4, 2022. Furthermore, statements that an individual is "unable to work" or "disabled" are administrative findings reserved to the



See Next Page

Commissioner. Therefore, Ms. Powell's statements are unpersuasive. In addition, in March 2022, Ms. Powell opined that the claimant was permanently disabled due to cognitive functioning. She found that the claimant had no physical limitations, but that she required reasonable mental accommodations to maintain employment. (Exhibit 13E p.20-21). These statements are also unpersuasive. Again, Ms. Powell did not opine as to the claimant's ability to perform specific mental work activities. Her statement that the claimant is "disabled" and her interpretation of "reasonable accommodations to maintain employment" are conclusory and inconsistent with the standard applied in this decision.

In addition, three staff members at Metro Care Services provided statements concerning the claimant's treatment (Exhibits 7F, 8F). However, these statements merely provided the claimant's multiple diagnoses and list of prescribed medications. They do not include any opinion as to the claimant's capacity for work activities. Therefore, these statements are of little probative value and unpersuasive.

Finally, the undersigned considered the lay statements of the claimant's husband, pastor, and co-worker at Exhibits 1E, 15E, and 13E. While they have been presented with good intention, the undersigned must determine the issue of disability based on the medical evidence and the degree to which the claimant's subjective complaints are consistent with the objective medical evidence. The daily activities reported by the claimant's husband are consistent with those reported by the claimant herself and discussed above. Furthermore, the statements of the claimant's pastor and coworker detail her past work experiences and challenges in the workplace, including taking longer to complete tasks and inability to work full-time. Thus, the undersigned has considered the statements as evidence, and finds them somewhat persuasive in assessing the claimant's capacity for work activities.

In sum, due to a combination of mental impairments and associated symptoms, the claimant is unable to engage in sustained work activity for a full 8-hour workday on a regular and consistent basis and would be off task at least 15% of the workday as she cannot sustain concentration, persistence, or pace to do even simple, routine tasks on a regular and continuing basis for 8 hours a day, 5 days a week. Therefore, the claimant cannot maintain work on a regular and continuing basis per Social Security Ruling 96-83, which states, "[o]rdinarily, RFC is an assessment of an individual's ability to do sustained work-related physical and mental activities in a work setting on a regular and continuing basis. A 'regular and continuing basis' means 8 hours a day, for 5 days a week, or an equivalent work schedule."

6. The claimant is unable to perform any past relevant work (20 CFR 404.1565).

The claimant has past relevant work as a composite job of pharmacy technician (*Dictionary of Occupational Titles* (DOT) 074.382-010), a light, semiskilled position with a specific vocational preparation (SVP) of 3 and an assistant manager, retail (DOT 185.137-010), a light, skilled position with an SVP of 7; and as a college instructor (DOT 090.227-010), a light, skilled position with an SVP of 8. As required by SSR 82-62, this work was substantial gainful activity, was performed long enough for the claimant to achieve average performance and was performed within the relevant period.



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However, the demands of the claimant's past relevant work exceed the residual functional capacity. During the hearing, the undersigned presented the impartial vocational expert with a hypothetical, which included the claimant's age, education, work experience, and the residual functional capacity outlined above, and was asked if such a hypothetical individual could perform any of the claimant's past work. The vocational expert indicated that such a hypothetical individual could not perform any of the past work classified at hearing with the characteristics and limitations outlined. Accordingly, the claimant is unable to perform past relevant work as actually or generally performed.

7. The claimant was a younger individual age 18-49 on the established disability onset date (20 CFR 404.1563).
8. The claimant has at least a high school education (20 CFR 404.1564).
9. The claimant's acquired job skills do not transfer to other occupations within the residual functional capacity defined above (20 CFR 404.1568).
10. Considering the claimant's age, education, work experience, and residual functional capacity, there are no jobs that exist in significant numbers in the national economy that the claimant can perform (20 CFR 404.1560(c) and 404.1566).

The claimant's ability to perform work at all exertional levels has been compromised by nonexertional limitations. To determine the extent to which these limitations erode the occupational base of unskilled work at all exertional levels, the Administrative Law Judge asked the vocational expert whether jobs exist in the national economy for an individual with the claimant's age, education, work experience, and residual functional capacity. The vocational expert testified that given all of these factors there are no jobs in the national economy that the individual could perform.

Pursuant to SSR 00-4p, the undersigned has determined that the vocational expert's testimony is consistent with the information contained in the *Dictionary of Occupational Titles*. To the extent that the vocational expert's statements address matters not contained within the *Dictionary of Occupational Titles (DOT)*, her testimony is based on her vocationally relevant education and experience as outlined in Exhibit 14E. Specifically, the vocational expert testified that because the DOT does not address time off task behavior, the portion of her testimony related to off task behavior is based on her professional experience.

Based on the testimony of the vocational expert, the undersigned concludes that the claimant is unable to make a successful vocational adjustment to work that exists in significant numbers in the national economy. A finding of "disabled" is therefore appropriate under the framework of section 204.00 in the Medical-Vocational Guidelines.

11. The claimant has been under a disability as defined in the Social Security Act since January 4, 2022, the alleged onset date of disability (20 CFR 404.1520(g)).



See Next Page

12. The claimant's substance use disorder(s) is not a contributing factor material to the determination of disability (20 CFR 404.1535).

Applying the sequential evaluation process a second time, the claimant's other impairments would not improve to the point of nondisability in the absence of the substance use disorder(s). The claimant has a history of alcohol abuse. However, the impairment is in sustained remission, as the claimant reported no alcohol use since 2007 (Exhibit 22F p.31). Accordingly, the claimant would still be disabled in the absence of the substance use disorder(s).

DECISION

Based on the application for a period of disability and disability insurance benefits filed on January 4, 2022, the claimant has been disabled under sections 216(i) and 223(d) of the Social Security Act since January 4, 2022.

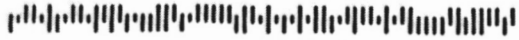
Medical improvement is expected with appropriate treatment. Consequently, a continuing disability review is recommended in 24 months.

/s/ Evelyn Maiben

Evelyn Maiben
Administrative Law Judge

February 14, 2024
Date





Tiffani Nicole Neubel Johnson
2615 SUMMERVIEW LANE
LANCASTER, TX 75146



EXHIBIT PP

Archived: Thursday, June 5, 2025 9:30:20 AM
From: Michelle Millen
Sent: Friday, January 21, 2022 1:04:26 PM
To: Tiffani Johnson Hatem Aboalam
Subject: RE: Rescheduled Appointment
Importance: Normal
Sensitivity: None

If you decide to move to an adjunct faculty, we can make that happen pretty quickly.
Michelle

From: Tiffani Johnson
Sent: Friday, January 21, 2022 12:49 PM
To: Michelle Millen <mmlillen@collin.edu>; Hatem Aboalam <haboalam@collin.edu>
Subject: RE: Rescheduled Appointment

Good morning,

I need to confirm some information with benefits before I confirm the switch.
Once I've confirmed the change, how soon will I be placed in adjunct status?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Michelle Millen
Sent: Thursday, January 20, 2022 11:32 AM
To: Tiffani Johnson <tnjohnson@collin.edu>; Hatem Aboalam <haboalam@collin.edu>
Subject: RE: Rescheduled Appointment

Tiffani,
To clarify your email, you are asking to be released from your 260 Contract and be re-classified as an adjunct faculty. I want to make sure you are clear that you will no longer have full-time status.

Please indicate confirmation that you would like to be transitioned to an adjunct faculty.

Thank you.

Michelle

From: Tiffani Johnson

Sent: Thursday, January 20, 2022 11:27 AM

To: Hatem Aboalam <haboalam@collin.edu>

Cc: Michelle Millen <mmillen@collin.edu>

Subject: Rescheduled Appointment

Importance: High

Good morning,

My dad's biopsy has been rescheduled for Monday, January 24th, and I've submitted the request in workday. If you let me know who will be covering my labs courses, I can work with them on the plans for the activities.

Thank you.

TJ

EXHIBIT QQ



Outlook

Re: Meeting tomorrow

From Michelle Millen <mmlillen@collin.edu>**Date** Thu 1/27/2022 2:15 PM**To** Tiffani Johnson <tnjohnson@collin.edu>**Cc** Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>

Tiffani,
We will discuss this after our meeting regarding the PIP.
See you tomorrow.

Michelle Millen, MSCPM, RHIA
Dean Academic Affairs
Health Sciences & Emergency Services
Collin College-McKinney Campus, H201
972.548.6677

From: Tiffani Johnson <tnjohnson@collin.edu>**Sent:** Thursday, January 27, 2022 1:11:17 PM**To:** Michelle Millen <mmlillen@collin.edu>**Cc:** Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>**Subject:** RE: Meeting tomorrow

Good afternoon Dean Millen,

I planned to email you to confirm re-classifying me as an adjunct.
The recent events with my dad's health forced me to go part-time.
I don't want my absences to impede the success of the students and the program.

Thank you.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Michelle Millen

Sent: Thursday, January 27, 2022 9:53 AM

To: Tiffani Johnson <tnjohnson@collin.edu>

Cc: Hatem Aboalam <haboalam@collin.edu>; Christy Phoenix <cphoenix@collin.edu>

Subject: Meeting tomorrow

Tiffani,

As I mentioned in my email we need to meet to finalize your performance improvement plan and discuss your contract status.

I will send a meeting invite for tomorrow at 2:30 pm.

Thank you.

Michelle Millen, MSCPM, RHIA

Dean – Academic Affairs

Health Sciences & Emergency Services

McKinney Campus – Collin College

Office: H203 Phone: 972.548.6677

Preparing healthcare professionals and first responders for optimal performance in challenging environments.

EXHIBIT RR



Follow up

From Michelle Millen <mmillen@collin.edu>
Date Wed 1/26/2022 9:42 PM
To Tiffani Johnson <TNJohnson@COLLIN.EDU>
Cc Hatem Aboalam <haboalam@collin.edu>

Tiffani,
Hatem has kept me in the loop regarding your family situation. I hope things have stabilized.
We need to complete a couple of time-sensitive items before January 31, 2022. If you are on campus by 1/31/2022, we can conduct it face-to-face. If not, I can schedule a Zoom.
Thank you and take care.

Michelle Millen, MSCPM, RHIA
Dean Academic Affairs-Workforce
Health Sciences and Emergency Services
Collin College – McKinney Campus, H201
972.548.6677

EXHIBIT SS

Tiffani N. Neubel-Johnson
2615 Summerview Lane
Lancaster, Tx 75146
Tel: (773) 216-1788

To: H. Neil Matkin, Ed.D.
District President
January 27, 2022

Dr. Matkin,

I am writing to let you know that due to the consistent harassment and lack of accountability I have received since beginning this position as Professor 260, I am hereby resigning from my job at Collin College, effective immediately. I have been subject to false accusations, failure to provide reasonable accommodation, intimidation tactics, attempts to discredit my character and reputation and when I brought the issues to the surface, I became the person to blame.

This abrupt decision to resign is a direct result of the recent actions of my supervisor Hatem Aboalam. On Wednesday January 26, 2022, while meeting with a student in my current class, Dr. Aboalam blamed me for not following through with his job responsibilities, spoke badly about me to my student and provided the student with false information about his responsibilities pertaining to course curriculum. The meeting with Dr. Aboalam resulted in the student sharing her anger and offense with me and the class. Immediately after class, I received a message from a different student in the same class stating that she had dropped all courses in the pharmacy tech program due to Dr. Aboalam's lack of support, and failure to answer and provide clarity on any of the student's questions.

The stress and harassment I've suffered in this workplace has been unbearable. My last day will be Friday, January 28, 2022. Please accept this letter as my official notice of resignation. While I am aware that this breaches my faculty contract, I apologize for any inconvenience my resignation may cause. I will not be returning to the office and will leave my keys with the health professions administrative assistant at the Tech campus. By bringing this incident to your attention, I hope that future employees will not have to tolerate such hostility and harassment in the workplace. If you wish to discuss this matter with me further, feel free to contact me at (773) 216-1788 or TNeubel26@gmail.com.

Dean Millen, Dr. Aboalam's supervisor, as well as the HR department were made aware of the issues with Dr. Aboalam on numerous occasions but never showed the desire to hold Dr. Aboalam accountable, only the desire to create a disciplinary record for me based on Dr. Aboalam's false accusations. In our weekly meetings I felt like a human punchbag instead of a team member who felt comfortable bringing my concerns to my supervisor and his supervisor.

Best regards,
Tiffani N. Neubel-Johnson

EXHIBIT TT

Archived: Thursday, June 5, 2025 12:05:50 PM
From: Hatem Aboalam
Sent: Friday, January 21, 2022 4:03:19 PM
To: Tiffani Johnson
Cc: Michelle Millen
Subject: Re: Rescheduled Appointment
Importance: Normal
Sensitivity: None

Thank you, I'll look.
I hope it goes well with the visit and the biopsy.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Friday, January 21, 2022 3:44:27 PM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Rescheduled Appointment

I forgot this attachment.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tiffani Johnson
Sent: Friday, January 21, 2022 3:35 PM
To: Hatem Aboalam <HAboalam@collin.edu>
Cc: Michelle Millen <MMillen@collin.edu>
Subject: RE: Rescheduled Appointment
Importance: High

Hi,

Please see the attached for Monday's labs. Let me know if you have any questions. As far as the request for 2/3, is the follow-up appointment after the biopsy.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Friday, January 21, 2022 1:18 PM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Michelle Millen <mmlillen@collin.edu>
Subject: RE: Rescheduled Appointment

I approved 1/24. I see you are also requesting 2/3 off which will require coverage for the classes as well. What is the reason you need that day off?

We covered this already in today's meeting, I will be cover DC class on 1/24. Will you send me what needs to be covered today so I can prepare?
And you will cancel the GP class on 1/24.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson
Sent: Friday, January 21, 2022 1:03 PM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Rescheduled Appointment

Hi,

Not sure what the system says on your screen, but whenever I do not have enough hours in a section, it won't allow me to submit.

I was able to submit the request based on the available 16 hours below.

I can submit the request as unpaid.

balances tracked in HOURS 4 items

Absence Plan	Beginning Year Balance	Accrued Year To Date	Absence Paid Year To Date	Absence Paid in Period	Ending Period Balance	Ending Period Balance Including Pending Events	As of Period
Personal Leave	0	24	24	0	0	0	01/01/2022 - 01/31/2022
Sick Leave	24	32	40	0	16	16	01/01/2022 - 01/31/2022

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Hatem Aboalam
Sent: Thursday, January 20, 2022 11:38 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: RE: Rescheduled Appointment

Sure, I reached out to Dr. Bands and waiting on a response.
You do not have enough balance as you have four hours left. You can work with HR for an alternative.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson
Sent: Thursday, January 20, 2022 11:27 AM
To: Hatem Aboalam <haboalam@collin.edu>
Cc: Michelle Millen <mmillen@collin.edu>
Subject: Rescheduled Appointment
Importance: High

Good morning,

My dad's biopsy has been rescheduled for Monday, January 24th, and I've submitted the request in workday.
If you let me know who will be covering my labs courses, I can work with them on the plans for the activities.

Thank you.

TJ

EXHIBIT UU

Archived: Thursday, June 5, 2025 12:06:03 PM
From: Hatem Aboalam
Sent: Tuesday, January 25, 2022 7:35:03 AM
To: Tiffani Johnson
Cc: Michelle Millen
Subject: Re: Calling in for a tomorrow
Importance: Normal
Sensitivity: None

I am sorry to hear, I hope he gets better soon. Please cancel both classes today. No coverage was secured with short notice.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: Tiffani Johnson <tnjohnson@collin.edu>
Sent: Monday, January 24, 2022 11:36:37 PM
To: Hatem Aboalam <haboalam@collin.edu>
Subject: Calling in for a tomorrow

Hi Hatem,

I sent you a text message as well, i will not be in tomorrow. I truly apologize for the late notice but I'm headed to the ER with my dad.

The procedure went well but he is having some serious complications. I will update you as soon as possible.
Again I apologize for this untimely notice.

Sent from my iPhone

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu

EXHIBIT VV

Tiffani Johnson

From: Hatem Aboalam
Sent: Monday, May 3, 2021 7:50 PM
To: Tiffani Johnson
Subject: RE: One month assessment meeting

Hello Tiffani,

Meeting confirmed to be on 5/5 @ 11:30 am-12:30 pm.

Thank you.

Hatem Aboalam, RPh
Director, Pharmacy Technician Program

Collin College Technical Campus
Office: A210F
2550 Bending Branch Way
Allen, TX 75013
Office #: 9725496393
Haboalam@collin.edu

From: [Tiffani Johnson](#)
Sent: Monday, May 3, 2021 1:25 PM
To: [Hatem Aboalam](#)
Subject: RE: One month assessment meeting

Okie Dokie.

Fyi the info session is scheduled for 5/5 @ 11 am. Are we canceling it?

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



EXHIBIT WW

Search

COUGARWEB LOGIN > (<https://cougarweb.collin.edu>)

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Complaints Form

Home (<http://www.collin.edu/>) / Human Resources (<http://www.collin.edu/hr/>) / Complaint Information and Forms
(<http://www.collin.edu/hr/complaint/>) / **EMPLOYEE COMPLAINTS AND GRIEVANCE**



6/10/2021

Employee: 1576
Claims From - Collin College

Employee Complaints From

COLLIN COLLEGE

EMPLOYEE COMPLAINT/GRIEVANCE/APPEAL SUBMISSION FORM

Please complete all the fields in the form below and use the "Submit" button at the bottom of the page to submit and initiate your complaint, grievance or appeal.

PART 1: COMPLAINANT'S CONTACT INFORMATION

CWID *

(b)(7)(C)

Last Name *

Neubel Johnson

First Name *

Tiffani

Address *

2550 Bending Branch Way

City *

Allen

State *

TX

Zipcode *

75013

Email Address *

TnJohnson@collin.edu

Phone Number *

773-216-1788

Job Title

Professor



Allen Center



6/10/2021

Employee: # 1577
Complaints From - Collin College

Are you a veteran? *

No ▼

PART 2: TYPE OF COMPLAINT (CHECK ALL THAT APPLY)

- ☐ 1. A complaint concerning an employee's wages, hours, or conditions of work, including performance evaluations or reviews.
- ☒ 2. A complaint concerning violations of College policy.
- ☒ 3. A complaint regarding specific allegations of unlawful discrimination or harassment based on sex, race, color, religion, national origin, age, veteran's status, disability, or any other legally protected classification.
- ☒ 4. A complaint regarding specific allegations of unlawful discrimination or retaliation based on the exercise of of legally protected rights.
- ☐ 5. A complaint regarding specific allegations of adverse personnel action based on the employee's good faith report to an appropriate law enforcement authority of a violation of law by the College District or employee, i.e., whistleblower complaints.
- ☐ 6. A complaint arising from the termination of an at-will employee.
- ☐ 7. A complaint arising from the non-renewal or termination of a contract employee.
- ☒ 8. Any other complaint, not specifically mentioned above, brought by an employee against another employee, supervisor, manager, student, vendor or the College District.

PART 3: DETAILS OF THE COMPLAINT

Please provide the name of the person(s) or entity against whom you are complaining. *

Hatem Aboalam



6/10/2021

Employee: # 32878 Complaints From - Collin College

Please provide the specific date(s) of the actions that led you to file this complaint. *

April 22, 2021, May 5, 2021, June 9, 2021

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Please provide the details of your complaint. Please list each applicable event, incident, or condition separately. Attach all documents that support your complaint in Part 5 below. *

I received a disciplinary action form from my supervisor on May 5, 2021, based on false accusations. In addition, he copied and used many of my words to him to use against me. I have text messages and emails to prove the lies he put in the disciplinary action. That action plan was an act of retaliation. A direct result of me expressed the help and resources I needed to do my job and him unavailable. As a result, the disciplinary action and email followed have misrepresented me as an insubordinate employee. Over the past two weeks, I have been asking for things from Hatem to complete specific projects. However, in turn, I start getting all these emails accusing me of not doing my job.

I've reached out to his supervisor Dr. Michelle Millen explaining the situation. But in emails, Hatem continuously twists conditions and verbiage to support his malicious actions. He pretends to be supportive or helpful; in reality, he avoids me in the office department area, only communicates via email or on a video meeting with Dr. Millen. Hatem has tried to build this Pharmacy technician program off the work of other colleges, including my previous employer. I have emails from when I sent them my work and recently reviewed from he has presented as his own but has Vernon college name in multiple areas. Hatem claimed to have used them as a reference; however, the information was copied verbatim. Every project I've completed for his program has been all my work that he has not contributed, has presented it as his own. I have an email proving he claimed my work as his own.

Hatem has gone above and beyond to accuse me of not being available or not working my required hours. As a result, since May 5th, I've afraid of going to the restroom, stepping out to warm my food, or leaving my office for any matter, know he will use it against me. On June 3rd, Hatem saw me at the copy machine right outside my office; he did not speak or acknowledge me. While I was still at the copy machine scanning documents, he returned to his office and called my office; I missed he called. That same day he sent an email that began with, "Hello Tiffani, I tried calling your office, but there was no answer however, " There have been many instances, I have risked my safety by staying on campus when everyone is leaving due to severe weather or tornado warnings. I'm afraid Hatem will call at 4:59 pm, and I don't answer, he will claim I'm not available or not work my required hours. I am the only financial support for my family can not afford to lose my job by any means, so I stayed. Several times, Jane Lopes has said to me, "Come on, everyone is leaving; the weather will get worse." One of those days, she stayed at my door until I shut down my computer and packed up to leave.

I can't fit everything in this box, I have attached a separate document with the remaining details.



6/10/2021

Employee: # 32579 Complaints From - Collin College

Please provide the name(s) of any witnesses, if applicable. *

Michelle Kelly
Leon Deutsch
Josh Snyder
Diana Eure
Christy Phoenix
Officer Powell

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Describe what information the witnesses, if any, named above have or know about your complaint. *

Michelle Kelly- On the day of 4/6, I showed Michelle Kelly the picture I took in the classroom. Mrs. Kelly can attest to me always being there before she gets to campus and there when she leaves. witness Hatem not being available to assist me, witness to him often not being in the office, coming in by 10 am and leaves daily by 2:30-3pm to pick up his son. She is aware that Hatem gave me projects that he said was complete months before I came on board.

Jane Lope - can attest to me staying in the office when It's not safe and everyone has done home.

Leon Deutsch- Me asking him for assistance with canvas, and that Hatem needs to assign me to my courses first, which he should have already done.

Josh Snyder- instructing me to have Hatem assign me to my courses in order for him to help me understand the faculty load

Diane Eure - sit at the the receptionist desk and can attest to the fact I never leave my office, I'm here sometimes before her and always before Hatem. I'm still here when she leaves at 5pm everyday.

Christy Phoenix - she was also surprised to see the disciplinary action, because Hatem hadn't expressed any concerns about me prior to the Email communication on April 22nd. She was also surprise that the situation between he and I warranted a disciplinary action. as well as some of the verbiage Hatem used in the disciplinary action.

1622



6/10/2021

Employee: [redacted] Complaints From - Collin College

Have you discussed the situation with anyone or attempted to resolve this situation prior to filing this complaint? If so, please explain. *

I requested a meeting with Christy Phoenix regarding Hatem and we met on April 28th.

I requested a one-on-one meeting with Dr. Millen the evening of the day I received the disciplinary action. We met in her office on May 11th.

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PART 4:RELIEF REQUESTED

Relief Requested *

I would like Hatem dismissed or terminated from his position.

I would like Hatem removed as my direct report and I be place under someone else supervision..

I would like the disciplinary action to be removed from my employee record.

PART 5: SUPPORTING DOCUMENTS

Upload any documents that support your complaint.



Choose File

Supporting Information.pdf

6/10/2021

Employee: Complaints From - Collin College

PART 6: AFFIRMATION AND ELECTRONIC SIGNATURE

By typing my electronic signature below and submitting this form, I hereby affirm that the information provided herein is true and correct to the best of my knowledge.

Electronic Signature *

Tiffani Neubel-Johnson

Signature Date *

06/10/2021



Submit

About Collin

[Contact Us \(/aboutus/contact_us.html\)](/aboutus/contact_us.html)

[Board of Trustees \(/leadership/board_of_trustees.html\)](/leadership/board_of_trustees.html)

[Administration \(/leadership/index.html\)](/leadership/index.html)

[Accreditations \(/aboutus/index.html#accreditation\)](/aboutus/index.html#accreditation)

[Economic Impact \(/masterplan/index.html#economicImpact\)](/masterplan/index.html#economicImpact)

[Mission and Core Values \(/aboutus/missioncorevalues.html\)](/aboutus/missioncorevalues.html)

[Taxpayer Information \(/community/taxpayer.html\)](/community/taxpayer.html)

[Giving to Collin \(/foundation/give/index.html\)](/foundation/give/index.html)



Resources

[Areas of Study \(/academics/programs/index.html\)](/academics/programs/index.html)

[Careers at Collin College \(/hr/employment/index.html\)](/hr/employment/index.html)

[Catalog \(/academics/catalog.html\)](/academics/catalog.html)

[Disability Services \(/studentresources/disabilityservices/index.html\)](/studentresources/disabilityservices/index.html)

[Mental Health \(Counseling\) \(/studentresources/counseling/index.html\)](/studentresources/counseling/index.html)

[Photo Archives \(/news/Event_Photos.html\)](/news/Event_Photos.html)

[Veterans Services \(/studentresources/veteransresources/index.html\)](/studentresources/veteransresources/index.html)

Campuses & Centers

[Collin Higher Education Center \(/chec/index.html\)](/chec/index.html)

[Courtyard Center \(/campuses/courtyard/index.html\)](/campuses/courtyard/index.html)

[Frisco Campus \(Preston Ridge\) \(/campuses/prestonridge/index.html\)](/campuses/prestonridge/index.html)

[McKinney Campus \(Central Park\) \(/campuses/centralpark/index.html\)](/campuses/centralpark/index.html)

[Plano Campus \(Spring Creek\) \(/campuses/springcreek/index.html\)](/campuses/springcreek/index.html)

[Public Safety Training Center \(/campuses/pstc/index.html\)](/campuses/pstc/index.html)

[Rockwall Center \(/campuses/rockwall/index.html\)](/campuses/rockwall/index.html)

[Technical Campus \(/campuses/technical/index.html\)](/campuses/technical/index.html)

[Wylie Campus \(/campuses/wylie/index.html\)](/campuses/wylie/index.html)

Policies

[Board Policies \(/hr/Board_Policy_Updates.html\)](/hr/Board_Policy_Updates.html)

[Required Links \(/requiredlinks.html\)](/requiredlinks.html)

[Annual Security & Fire Safety Reports \(/studentresources/deanofstudents/AnnualSecurityReports.html\)](/studentresources/deanofstudents/AnnualSecurityReports.html)

[Clery Act \(/studentresources/deanofstudents/CleryAct.html\)](/studentresources/deanofstudents/CleryAct.html)



Report Fraud, Waste and Abuse (/internalaudit/fraudreporting.html)



Collin College Emergency Services (/campuspolice/index.html)

CougarAlert (Emergency Notification) (/cougaralert.html)

Collin College - 3452 Spur 399 - McKinney, Texas 75069 - 972.548.6790 (tel:1-972-548-6790)

Last Modified By: rmichael@collin.edu on 05/21/2018 6:19 p.m. © (http://a.cms.omniupdate.com/10?skin=oucampus&account=collin&site=2018-redesign&action=de&path=/hr/complaints/Employee%20Complaints%20Form%20DGBA.pcf)



EXHIBIT XX

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 450-2022-00371 </div> </div>	
Texas Workforce Commission Civil Rights Division and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Tiffani Neubel-Johnson		Home Phone (Incl. Area Code)	Date of Birth 1981
Street Address City, State and ZIP Code 2615 Summerview Lane, Lancaster, TX 75146			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name COLLIN COLLEGE		No. Employees, Members 201 - 500	Phone No. (Include Area Code) (972) 985-3783
Street Address City, State and ZIP Code 3452 Tx-399 Spur 3rd Floor, Mckinney, TX 75069			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap;"> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> OTHER (Specify)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 04-29-2021 10-26-2021 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): PERSONAL HARM: Within the short time working for Respondent, I've experienced racial discrimination, when I was not welcome to the department, an email was not sent to congratulate me for the selection, I don't have a nameplate as of today, another white coworker was recently hired, and she has a nameplate. I was subjected to disability discrimination on April 29, 2021, when I asked for more time to do my job due to my disability; instead, I was given a book to read, "how to control my emotions." I was subjected to religious discrimination when my Supervisor asked me to sit in after work hours for his webinar meeting during my prayer days that he is aware of as I let him know, , after I agreed to help, he said, "good, I don't want to miss my kid's first soccer game." If I had been Muslim like him, he would have respected my prayer hours. I was subjected to retaliation on May 5, 2021; I was disciplined for not understanding my job description and availability because the building area doesn't have signal reception; when I don't answer my Supervisor's text right away, I'm labeled as non-compliance. On May 8, 2021, I reached out to Human Resources by email asking for additional time to complete			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
10/26/2021 <i>Tiffani N. Johnson</i> Date Charging Party Signature		SIGNATURE OF COMPLAINANT <i>Tiffani N. Johnson</i> SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) 10/26/2021	

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):



FEPA



EEOC

450-2022-00371

Texas Workforce Commission Civil Rights Division

and EEOC

State or local Agency, if any

projects due to my disability to no avail. I've asked multiple times for clarifications of my duties; instead of providing me with answers, I get written up for not understanding my job assignments. On June 14, 2021, I was written up; because a white coworker felt offended because I said I felt like a slave. CP was written up for Behavior Deficiency.

RESPONDENT'S REASON FOR ADVERSE ACTION:

I was not provided a legitimate reason.

DISCRIMINATION STATEMENT:

I believe I was discriminated against and retaliated against because of my race (black, African American), my deeply held religious beliefs, in violation of the Title VII of the Civil Rights Act of 1964, as amended. I believe I was discriminated against due to my disability, in violation of the Americans with Disabilities Act of 1990.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

10/26/2021

Date

Liffani N. Johnson
Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Liffani N. Johnson
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

10/26/2021

EXHIBIT YY

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

TIFFANI N. NEUBEL-JOHNSON,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:22-cv-1029-SDJ-BD
	§	
COLLIN COLLEGE,	§	
	§	
Defendant.	§	
	§	

**PLAINTIFF’S RESPONSE TO DEFENDANT’S FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Defendant Collin College, Plaintiff, Tiffani N. Neubel-Johnson, by and through undersigned counsel, hereby Responds to Defendant’s First Set of Interrogatories to Plaintiff Tiffani N. Neubel-Johnson.

INSTRUCTIONS

1. These interrogatories shall be deemed continuing so as to require prompt supplemental responses in accordance with Federal Rule of Civil Procedure 26(e). Therefore, Defendant is required to supplement or revise its answers when appropriate or necessary.

2. Each of the definitions and instructions shall be fully applicable to each interrogatory notwithstanding that the definitions or instructions may in whole or in part be reiterated in a particular interrogatory and an interrogatory may incorporate supplemental instructions or definitions.

3. In the event that you serve a proper and timely objection to any individual interrogatory or a portion thereof, please respond to all portions of the interrogatory which do not fall within the ambit of your objection, pursuant to Rule 33(b). For example, if an interrogatory is objected to on the grounds that it is too broad and seeks both information which is relevant to the subject matter and information which is not, Plaintiff should provide such information as is conceivably relevant.

INTERROGATORIES

INTERROGATORY NO. 1: Identify the disability/disabilities which you contend you had during your employment with the College, and state with particularity the major life activity which was substantially limited and the duration of same, the date of onset, your treating healthcare provider for such condition and the date you made the College aware of the alleged disability. Identify with specificity any supporting documents. Do not refer to the pleadings.

ANSWER: Please Refer to Exhibits B, C, E, V, P

- The disability/disabilities Plaintiff had during time of employment with the College are Attention Deficit Hyper Disorder (ADHD), Obsessive-Compulsive Disorder (OCD), Major Depressive Disorder (MDD) and Post-Traumatic Stress Disorder (PTSD).
- The major life activity/activities that are limited and the duration of same, the date of onset, treating healthcare provider for such condition and the date Plaintiff made the College aware of the alleged disability/disabilities are listed in Exhibits B, C, E, V, and P.

INTERROGATORY NO. 2: Identify each and every request for reasonable accommodation you claim you made to the College and whether it was granted or denied. For each accommodation request identified, state the name of the individual to whom you made the request, the date of the request, the date(s) and reason(s) for denial, and the identity of all witnesses. Identify with specificity any supporting documents. Do not refer to the pleadings.

ANSWER: Please refer to Exhibits C, E, P, R

- Plaintiff's first formal request for reasonable accommodation was made to the College's Human Resource Department on March 25, 2021, to Chirstina Canales; Human Resource Representative. This request was to have a service dog at work. The request was granted on April 8, 2021, and Plaintiff's supervisor Hatem was copied on the approval email. (Please See Exhibit C)
 - On April 8, 2021, Plaintiff met with Hatem for a scheduled one-on-one meeting to discuss the specifics of Plaintiff's disabilities.
- Plaintiff's next request took place on May 8, 2021. Plaintiff emailed Human Resource Representative, Christina Canales, requesting work schedule flexibility to allow focused time for completing task. Canales notified Plaintiff that Plaintiff needed a new letter from Plaintiff's doctor. To obtain a new letter from the doctor, an in-person doctor's visit was required. Plaintiff's Doctor's office and work schedule conflicted, and Plaintiff was not allowed to leave work for an in-person doctor's visit and had to abandon the work flexibility accommodation request.

- Plaintiff spoke with Hatem on June 3, 2021, about covering Plaintiff's window to help with minimizing work distractions. Hatem verbally approved the request on that same day. On June 11, 2021, Plaintiff received an email from Hatem demanding Plaintiff remove the window coverings as they were not permitted.
- On June 14, 2021, during a meeting with Hatem and Christy Phoenix, Plaintiff again spoke about the request for a window covering. During the meeting Plaintiff was told the College was looking into ordering a window shade, in which the window shade was never provided. (Please See Exhibit R; audio recording at 16:30-17:29 and 24:38-25:53).
- On August 16, 2021, Plaintiff requested an audiobook version of a required reading assigned as part of Plaintiff's performance-improvement-plan. The request was made in person to Hatem with Christy Phoenix present as a witness. The request was approved, and Plaintiff was provided with a CD set of the book. (Please See Exhibit R; audio recording)
- On September 29, 2021, Plaintiff submitted a request for several accommodations including a modified work schedule, professional training for supervisors working with employees with disabilities; a window covering; and scheduled focus time. Those made aware of this request were Hatem, Tim Damian, and Christie Phoenix. This request was neither approved nor denied. (Please See Exhibit P)

INTERROGATORY NO. 3: Describe in reasonable detail all facts that support your contention that the College discriminated against you because of your disability. Include the dates and times when you claim this occurred, what you contend constituted discrimination against you because of your disability, and the identity of all witnesses. Do not refer to the pleadings.

ANSWER: Please See Exhibits R, O

- During a meeting on November 2, 2021, with Dean Millen and Hatem, Plaintiff was asked about Plaintiff's disabilities. As Plaintiff began explaining the challenges caused by the disabilities, Hatem interrupted and asked if Plaintiff had "real human emotions." Due to this statement being made while Plaintiff was explaining the disability challenges, this showed that Hatem did not think Plaintiff had "real human emotions" due to Plaintiff's disabilities, inferring that Plaintiff was an animal and not a real human. Dean Millen was present in the same meeting and did not address or correct Hatem. Neglecting to address this behavior was commonplace for the College. (Please See Exhibit R)
- On November 9, 2021, during a meeting with Hatem and Dean Millen, Hatem stated that Plaintiff's disabilities were irrelevant, and that Hatem did not need to make any special accommodations for Plaintiff to perform the job. As Plaintiff's supervisor, Hatem

blatantly stating that he does not need to make any special accommodations for Plaintiff completely goes against the ADA. (Please See Exhibit R at 30:57 to 40:00).

- During a meeting with Hatem and Christie Phoenix, Plaintiff was presented with a Performance Improvement Plan (PIP), which included a requirement for Plaintiff to read “Emotional Intelligence 2.0.” Plaintiff requested an audio version of the book, to which Hatem asked if Plaintiff was serious. Plaintiff affirmed the request, emphasizing that the audio version of the book was necessary due to the disability. These sly remarks and comments became commonplace and exhibited the level of grossly negligent discriminatory acts made by Hatem. These acts and comments were witnessed by others and still went unchecked. (Please See Exhibit O)

INTERROGATORY NO. 4: Describe in reasonable detail all facts that support your contention that the College harassed you because of your disability. Include the dates and times when you claim this occurred, what you contend constituted harassment against you because of your disability, where the alleged harassment occurred and the identity of all witnesses. Do not refer to the pleadings.

ANSWER: Please See Exhibit R

- On June 9, 2021, Hatem sent several emails throughout the day, harassing Plaintiff by repeatedly asking and reminding Plaintiff to be at work on time although Plaintiff had not been late to work.
- On June 11, 2021, Hatem asked Plaintiff to remove the window covering that was originally approved by Hatem. Hatem knew this covering was needed to accommodate Plaintiff’s disability, however with knowing that information, Hatem went back on his prior approval only to tell Plaintiff to remove the much-needed window covering. (Please See Exhibit R)
- On June 14, 2021, Plaintiff received a Level One disciplinary action, almost immediately after a formal complaint was filed against Hatem on June 10, 2021. This Disciplinary action was an act of harassment because of the complaint being filed against Hatem.

INTERROGATORY NO. 6: Describe in reasonable detail all facts that support your contention that the College created a barrier to your request for reasonable accommodation. Include the dates and times when you claim this occurred, what you contend constituted a barrier to your request for accommodation, who created the alleged barrier, the request for accommodation at issue, and the identity of all witnesses. Do not refer to the pleadings.

ANSWER: Please Refer to Interrogatory No 2 Answer

INTERROGATORY NO. 7: Describe with specificity the factual basis for your contention that the College committed unlawful retaliation against you, including, for each instance of retaliation you contend occurred:

- a) the protected activity you engaged in;
- b) when you engaged in the protected activity;
- c) how the College had notice of your protected activity;
- d) the adverse employment action taken against you by the College, including the date;
- e) the person(s) engaged in such adverse employment action
- f) how the adverse employment action was caused by your protected activity;
- g) the damages you suffered as a result of that adverse employment action;
- and h) the identity of documents supporting your answer to this Interrogatory.

ANSWER: Please See Exhibits E, I, K, O, R, U

- On April 27, 2021, Plaintiff had an informal meeting with Christie Phoenix regarding Hatem. As a result of that meeting, Plaintiff requested a formal meeting with Hatem and his supervisor, Dean Millen, to discuss Plaintiff's disabilities and job expectations. This meeting was scheduled for May 5, 2021. On the day of the meeting, there was no discussion regarding Plaintiff's concerns, and instead Plaintiff was presented with a Level One Disciplinary action. This was an immediate retaliation from the informal meeting with Christie Phoenix. As a result of the informal meeting about Hatem, the beginning of the constant retaliation was born.
- On June 10, 2021, Plaintiff filed a formal complaint with the HR department. Plaintiff did not receive a response within the required time per company policy. However, on June 14, 2021, Plaintiff received a Level Two Disciplinary Action for a comment made to Diana Eire, who had provided Plaintiff with information to list Daina as a witness for Plaintiff's formal complaint. On the same day that Plaintiff received the Level Two

Action, Plaintiff also received an email revoking a previously approved verbal accommodation (refer to Interrogatory No. 2 answer) and denying another accommodation request for a modified schedule (see Interrogatory No. 2). The individuals involved in these actions included Hatem, Dean Millen, Christie Phoenix, Maxine Maxwell, and Diana Eire. The formal complaint was filed and as a result here another Disciplinary Action was presented coupled with accommodation requests were denied.

- Plaintiff filed a formal complaint with the State Auditor's Office on June 14, 2021. The President of the College, Neil Matkin was notified and advised to act, but Plaintiff never heard back from the President of the College. On July 13, 2021, Plaintiff received an email from Tanya Jacobson stating that Plaintiff's complaint was received, and instructed Plaintiff to file a formal complaint. Plaintiff informed Jacobson that the formal complaint was filed on June 10, 2021, but Jacobson denied receiving the complaint. Consequently, she accepted and entered the details of Plaintiff's June 10, 2021, complaint on July 13, 2021. On July 29, 2021, Plaintiff received an "Overall Needs Improvement" rating on Plaintiff's performance review. According to The College's policy, Plaintiff should have received a "Meets Expectations" rating in areas where it was impossible to have completed the required work. Instead, Plaintiff was given a "Needs Improvement" rating without any supporting facts to justify this assessment. As Plaintiff's supervisor, Hatem was responsible for Plaintiff's Performance Review.
- Plaintiff filed charges against the College with the EEOC on October 29, 2021. The College was notified on November 2, 2021, and refused mediation on November 9, 2021. During a meeting with Hatem and Dean Millen, Hatem stated that Plaintiff's disabilities were irrelevant and refused to make any accommodation for Plaintiff to perform Plaintiff's job. Dean Millen supported this statement, which led to a third disciplinary action for failing to complete the requirements of Plaintiff's Performance Improvement Plan.

INTERROGATORY NO. 10: Describe with specificity your communication(s) with students, including, but not limited to, Stephanie Hata, Taylor Lee, and Simon Rhamy, regarding Hatem Aboalam as alleged in page 15 of the Complaint. Include the dates and times the communication(s) occurred, the method of communication(s), the content of the communication(s), and the identity of all witnesses. Do not refer to the pleadings.

ANSWER: All communication with students occurred through face-to-face interactions, phone calls and text messages. Plaintiff no longer has access to the app used for texting and calling the students.

•

Respectfully submitted,

/s/Reginal C. Johnson

REGINAL C. JOHNSON

Bar No. 24117955

325 North Saint Paul St.

Dallas, Texas, 75201

214-677-5281

Reginalcjohnson@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this, the 14th day of May 2025, a true and correct copy of the foregoing was filed utilizing the Court's ECF system and Collin College, Defendant, was notified via e-mail: jshin@clarkhill.com.

/s/ Reginal C. Johnson
REGINAL C. JOHNSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

TIFFANI N. NEUBEL-JOHNSON,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:22-cv-1029-SDJ-BD
	§	
COLLIN COLLEGE,	§	
	§	
Defendant.	§	
	§	

PLAINTIFF'S SUPPLEMENT TO DEFENDANT'S INTERROGATORY REQUEST

Defense Counsel stated that Plaintiff's response to Defendant's Interrogatory request was deficient in multiple areas. Here is a supplement to Plaintiff's First Response to Defendant's Interrogatory Request.

Interrogatory No.6

Please provide a detailed account of the facts supporting her assertion that the College obstructed her request for reasonable accommodations, including relevant dates and times:

ANSWER:

1. On May 4, 2021, Neubel-Johnson sent an email to Hatem requesting a modified work schedule to accommodate her monthly doctor's appointments for prescription medication. This medication, a controlled substance, necessitated an in-person visit for each refill, specifically for her ADHD treatment. Neubel-Johnson also contacted Christy Phoenix with the same request for a modified schedule. The following day, May 5, 2021, Christy responded, stating, "It is expected

for you to work a 40-hour work week. The typical schedule is 8 a.m. to 5 p.m., including an hour for lunch. If you need to adjust the hours, please coordinate with your supervisor.” Hatem also replied on May 5, 2021, shortly after issuing Neubel-Johnson a Level 1 Disciplinary Action, emphasizing, “The expectation for office hours is Monday to Friday from 8 a.m. to 5 p.m. Please communicate about any appointments in advance so we can prepare accordingly.” (Exh. E, Pg. 68). Here a barrier was created because as a new employee, Neubel-Johnson did not have Paid Time Off or sick leave to substitute for any missed time at work. Defendant’s focus on office hours of 8am to 5pm made it impossible for Neubel-Johnson to schedule the necessary doctor’s appointment for the reasonable accommodation request.

2. On May 8, 2021, Neubel-Johnson emailed Christina Canales to request extensions for work projects. Neubel-Johnson sought flexibility in her work schedule to allow focused time for task completion and to attend monthly doctor’s appointments. Christina’s response indicated that a new letter from Neubel-Johnson’s doctor would be necessary. As previously stated, obtaining this letter required another in-person visit during business hours, which conflicted with Neubel-Johnson’s expected work schedule. Neubel-Johnson was unable to take time off to secure the required letter, forcing Neubel-Johnson to forgo the accommodation request and consequently miss appointments necessary for obtaining her medication. This medication was necessary for Neubel-Johnson to maintain her work performance and fulfill job responsibilities. Not allowing Neubel-Johnson the time to attend the necessary Doctor’s appointments created a barrier to Neubel-Johnson’s accommodation request.

3. On June 3, 2021, Neubel-Johnson discussed with Hatem, the need to cover her office window to reduce distractions, as Neubel-Johnson’s office was located outside the breakroom. The breakroom was a location routinely used by everyone, naturally caused major distractions. In the moment. Hatem verbally approved this request that same day. On June 11, 2021, Neubel-Johnson received an email instructing Neubel-Johnson to remove the window coverings, as they were all of a sudden no longer allowed. During a meeting on June 14, 2021, with Hatem, Dean Millen, and Christy, Neubel-Johnson reiterated her need for window coverings, Neubel-Johnson was informed that they were considering ordering a shade, but in the meantime, nothing was permitted to cover the window. The shade was never ordered, but the distractions from the breakroom remained. This negligent behavior by Dean Millen and those involved created a barrier to Neubel-Johnson’s reasonable accommodation request since The College did not do anything to help mitigate the distractions coming from the breakroom.

4. On September 29, 2021, Neubel-Johnson submitted a second formal request for various accommodations. From September 29 through December 7, 2021. There were multiple emails exchanged between Neubel-Johnson, Christina Canales, Hatem, and Dean Millen, regarding the specifics and status of Neubel-Johnson’s requests. On November 2, 2021, during a recorded Zoom meeting with Hatem and Dean Millen, Neubel-Johnson was again asked about her disabilities. While describing the challenges posed by Neubel-Johnson’s disabilities, Hatem interrupted, questioning whether Neubel-Johnson possessed “real human emotions” Dean Millen

did not address this discriminatory remark, and Neubel-Johnson was not allowed to complete the explanation of Neubel-Johnson's disabilities. The meeting was scheduled to discuss ways to assist Neubel-Johnson. However, once Hatem asked the question about Neubel-Johnson having "real human emotions," the meeting was derailed. The barrier was created here due to Hatem's insensitivity to Neubel-Johnson's disability and not allowing Neubel-Johnson to fully explain Neubel-Johnson's disabilities and Dean Millen not addressing the statements. Neubel-Johnson also viewed this statement as being racially insensitive, insinuating that Neubel-Johnson was an animal instead of a human being. On November 9, 2021, in a meeting with Hatem and Dean Millen, Neubel-Johnson was questioned about communication issues between Neubel-Johnson and Hatem. While Neubel-Johnson was in the midst of responding and speaking about the ongoing accommodation requests, which had yet to be approved or denied at this point, again Hatem interrupted, asserting that Neubel-Johnson's disabilities were irrelevant and Hatem was not obligated to make accommodations for Neubel-Johnson to perform the job. Here the barrier to accommodation requests is exhibited by Hatem's failure to allow Neubel-Johnson to speak about the previous ongoing accommodation requests.

Interrogatory No. 9:

This Interrogatory asked Neubel-Johnson to describe with specificity each reason Neubel-Johnson resigned from her employment with Collin College.

ANSWER:

Yes, Exhibit Q includes all the reasons for Neubel-Johnson's resignation from Collin College.

Interrogatory No. 10:

This Interrogatory asked Neubel-Johnson to describe with specificity her communication(s) with students, including but not limited to, Stephanie Hata, Taylor Lee, and Simon Rhamy, regarding Hatem Aboalam as alleged in page 15 of the Complaint. The Interrogatory also asked Neubel-Johnson to include the dates and times the communication(s) occurred, the method of communication(s), the content of the communication(s), and the identity of all witnesses.

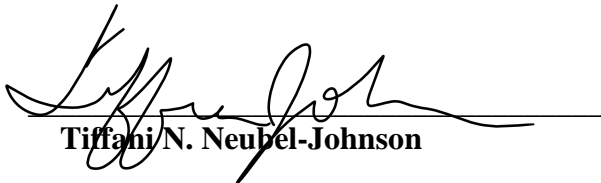
ANSWER:

The communications concerning Hatem, as mentioned on page 15 of the Complaint, occurred face-to-face in the classroom on January 27, 2022, involving Neubel-Johnson, Stephanie Hata, Taylor Lee, Gabe Sanchez, and Simon Rhamy. Stephanie expressed her frustration about a meeting with Hatem, describing him as condescending, dismissive, and lacking accountability for his actions. Additionally, he spoke negatively about the Neubel-Johnson and blamed her for class cancellations and modalities for which he was responsible. Stephanie questioned how Hatem expected her to return to class and trust that the Neubel-Johnson was the right person to teach. She noted that, fortunately, she knew better, as everything the Neubel-Johnson had taught her had proven to be accurate and helpful. Taylor announced that it would be her last day, and she planned to drop out of the program immediately after class. After class on January 27, 2022, Taylor confirmed via group text that she had officially withdrawn from the program. The conversations continued through group text on January 27, 28, and 31, during which the students expressed their disappointment with Hatem and discussed whether the remaining three students should also drop the program.

VERIFICATION

I, **Tiffani N. Neubel-Johnson**, declare under penalty of perjury that I am the Plaintiff, Tiffani N. Neubel-Johnson, a party to this action; that I have read the foregoing responses to Defendant's First Set of Interrogatories; and that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the answers contained therein are true and correct.

Executed on this **29th** day of **May**, 2025.



Tiffani N. Neubel-Johnson

Respectfully submitted,

/s/ Reginal C. Johnson

Reginal C. Johnson

State Bar No. 24117955

reginalcjohnson@gmail.com

325 North Saint Paul St.,

Dallas, TX 75201

214-677-5281

**ATTORNEY FOR PLAINTIFF
TIFFANI NEUBEL-JOHNSON**

CERTIFICATE OF SERVICE

I hereby certify that on this, the 29th day of May, 2025, a true and correct copy of the foregoing was filed utilizing the Court's ECF system and COLLIN COLLEGE, was notified through their attorney via e-mail: mkuelbs@clarkhill.com.

/s/ Reginal C. Johnson

REGINAL C. JOHNSON

EXHIBIT *ZZ*

Archived: Wednesday, June 4, 2025 5:38:07 PM
From: Tiffani Johnson
Sent: Tuesday, May 11, 2021 2:57:38 PM
To: Tonya Jacobson
Subject: RE: Filing a Grievance
Importance: Normal
Sensitivity: None

Okay, thanks.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



CONFIDENTIALITY NOTICE: Because e-mail is not a secure medium, confidentiality of e-mail messages cannot be guaranteed. This email message, including all attachments, is for the sole use of the intended recipient(s) and may contain confidential student and/or employee information. Unauthorized use and/or disclosure is prohibited under the federal Family Education Rights & Privacy Act (20 U.S.C. §1232g, 34 CFR Part 99, 19 TAC 247.2, Texas Government Code 552.023. If you are not the intended recipient, you may not use, disclose, copy or disseminate this information. Please call the sender immediately or reply by email and destroy all copies of the original message, including attachments.

From: Tonya Jacobson
Sent: Tuesday, May 11, 2021 11:59 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Filing a Grievance

Hi Ms. Johnson,

Yes, you will be allowed to submit additional documents after the compliant submission date, and prior to the hearing date.

Thank you,

Tonya Jacobson
Manager, HR/Employee Relations
Collin College
P: (972)758-3856
F: (972) 985-3778
Tjacobson@collin.edu



From: Tiffani Johnson
Sent: Tuesday, May 11, 2021 9:12 AM
To: Tonya Jacobson <tjacobson@collin.edu>
Subject: RE: Filing a Grievance

Good morning,

Will I have an opportunity to submit additional supporting documents after I submit the official form? There is a lot of emails communications and documents I have to support my claim; it will take me several days to gather. In addition, the situation is on going to this present day and Im trying to keep up with the details while trying to complete my work.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP
Pharmacy Technician Professor
Office #: 972-553-1127
TNJohnson@Collin.edu



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From: Tonya Jacobson
Sent: Thursday, May 6, 2021 11:22 AM
To: Tiffani Johnson <tnjohnson@collin.edu>
Subject: RE: Filing a Grievance

Hi Ms. Johnson,

This link <http://www.collin.edu/hr/complaints/index.html> will take you to the complaint information webpage. You may review the board policies and procedures as well as access the link to file a complaint.

Thank you,

Tonya Jacobson
Manager, HR/Employee Relations

Collin College

P: (972)758-3856

F: (972) 985-3778

Tjacobson@collin.edu



HUMAN RESOURCES
People Helping People Succeed

From: Tiffani Johnson

Sent: Thursday, May 6, 2021 10:52 AM

To: Tonya Jacobson <tjacobson@collin.edu>

Subject: Filing a Grievance

Importance: High

Good Morning Ms. Jacobson,

I need to file a grievance against my direct supervisor. Would you mind sending me the information on how to start the process?

I appreciate any help you can provide.

Tiffani N. Neubel-Johnson, AA, CPh.T.R, CPP

Pharmacy Technician Professor

Office#: 972-553-1127

TNJohnson@Collin.edu

Collin College Technical Campus

2550 Bending Branch Way

Allen, TX 75013

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